

# **SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT**

## **FINAL TITLE V APPLICATION REVIEW AERA ENERGY, LLC FACILITY S-1547**

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## **TITLE V APPLICATION REVIEW**

Project #: 961001

Deemed Complete: 6/27/97

Engineers: Kamaljit Sran  
Douglas Shaffer Joe  
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Date: November 25, 2002

Facility Number: S-1547  
Facility Name: Aera Energy LLC  
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Responsible Official: E. J. Voiland - President and Chief Executive Officer  
M. R. Turner – Senior Vice President  
R. H. John – Senior Vice President

### **I. PROPOSAL**

Aera Energy LLC is proposing that an initial Title V Permit be issued for its existing heavy oil production facility in Western Kern County. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

Dormant Emission Units: The following permit units at this facility have been identified as “dormant”, or not currently allowed to operate, by conditions on the Permit To Operate: 11, 12, 14, 19, 23, 26, 32, 47, 48, 55, 56, 57, 58, 67, 68, 79, 80, 81, 85, 93, 117, 119, 120, 124, 129, 133, 135, 137, 138, 140, 147, 179, 187, 249, 254, 256, 257, 356, 357, 567, 570, 574, 575, 576, 578, 581, 698, 1036, 1037, 1058, 1059, 1074, 1075, 1086, 1088, 1089, 1090, 1098. Since the units can not legally operate, no further evaluation of the permit content for the above listed units is required at this time. Permit condition 1 for each of these units assures that all Title V requirements will be addressed for each unit prior to operation.

### **II. FACILITY LOCATION**

Aera Energy LLC heavy oil production facility is located in Western Kern County’s Lost Hills, Belridge, and Midway Sunset oil fields.

### **III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories, which describe the insignificant activities or equipment at the facility not requiring a permit, is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

#### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. SJV-UM-0-0, Facility-Wide Umbrella

The applicant has requested to utilize template SJV-UM-0-0, Facility-Wide Umbrella, to address facility-wide requirements (S-1547-0-1). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-BSG-13-0, Boilers, Steam Generators, and Process Heaters

The applicant has requested to utilize template SJV-BSG-13-0, Series 13 Boilers, Steam Generators and Process Heaters, for the following units: 168, 175, 176, 664, 667, 668, 669, and 670. Based on the information submitted, the following units do not qualify for the use of this template: 664, 667, 668, 669, and 670.

C. SJV-BSG-15-0, Boilers, Steam Generators, and Process Heaters

The applicant has requested to utilize template SJV-BSG-15-0, Series 15 Boilers, Steam Generators and Process Heaters, for the following units: 1, 3, 7, 10, 13, 16, 17, 22, 24, 40, 70, 173, 174, 189, 190, 234, 238, 248, 709, 719, 722, 723, 725, 726, 727, 728, 729, 733, 734, 735, 736, 737, 738, 742, 743, 744, 745, 746, 747, 748, 749, and 751. Based on the information submitted, the applicant qualifies for the use of this template.

D. SJV-BSG-17-0, Boilers, Steam Generators, and Process Heaters

The applicant has requested to utilize template SJV-BSG-17-0, Series 17 Boilers, Steam Generators and Process Heaters, for the following units: 92, 94, 95, 96, 114, 116, 118, 125, 156, 167, 128, 130, 134, 139, 251, 252, 569, 663, 666, 673, and 697. Based on the information submitted, the following unit does not qualify for the use of this template: 673.

E. SJV-BSG-19-0, Boilers, Steam Generators, and Process Heaters

The applicant has requested to utilize template SJV-BSG-19-0, Series 19 Boilers, Steam Generators and Process Heaters, for the following units: 59, 60, 61, 62, 65, 66, 74, 75, 76, 77, 78, 86, 87, 121, 122, 123, 141, 142, 143, 144, 145, 146, 152, 157, 158, 159, 164, 241, 242, 243, 244, 245, 250, 355, 361, 362, 363, 656, 657, 681, 682, 683, 684, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 839, 885, 886, 1030, 1034, and 1035. Based on the information submitted, the following units do not qualify for the use of this template: 1034 and 1035.

F. SJV-BSG-22-0, Boilers, Steam Generators, and Process Heaters

The applicant has requested to utilize template SJV-BSG-22-0, Series 22 Boilers, Steam Generators and Process Heaters, for unit 994. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template

G. SJV-GS-1-0, Gasoline Dispensing

The applicant has requested to utilize template SJV-GS-1-0, Gasoline Dispensing, for units S-1547-913-2, -914-2, -915-2, and -1022-2. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

H. SJV-IC-1-0, Internal Combustion Engines

The applicant has requested to utilize template, SJV-IC-1-0, Internal Combustion Engines for units (S-1547-699-0, -700-0, and -911-0). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

I. SJV-IC-2-0, Internal Combustion Engines

The applicant has requested to utilize template, SJV-IC-2-0, Internal Combustion Engines for one unit S-1547-703-0. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

J. SJV-SU-1-0, Sumps

The applicant has requested to utilize template, SJV-SU-1-0, Sumps for unit (S-1547-864-0). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

K. SJV-WV-1-0, Well Vent

The applicant has requested to utilize template, SJV- WV-1-0, Well Vent for TEOR units S-1547-359-10, -638-3, -704-3, -707-3, -708-2, -714-0, -819-0, -820-0, -821-0, -823-0, and -912-0. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

**V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Conditions 1 through 39 of the requirements for facility wide permit unit S-1547-0.

Conditions 1 through 16 on the following permit units: [168](#), [175](#), and [176](#).

Conditions 1 through 15 on the following permit units: 1, 3, 7, 10, 13, 16, 17, 22, 24, 40, 70, 173, 174, 189, 190, 234, 238, 248, 709, 719, 722, 723, 725, 726, 727, 728, 729, 733, 734, 735, 736, 737, 738, 742, 743, 744, 745, 746, 747, 748, 749, and 751.

Conditions 1 through 14 on the following permit units: 92, 94, 95, 96, 114, 116, 118, 125, 156, 167, 128, 130, 134, 139, 251, 252, 569, 663, 666, and 697.

Conditions 1 through 14 on the following permit units: 59, 60, 61, 62, 65, 66, 74, 75, 76, 77, 78, 86, 87, 121, 122, 123, 141, 142, 143, 144, 145, 146, 152, 157, 158, 159, 164, 241, 242, 243, 244, 245, 250, 355, 361, 362, 363, 656, 657, 681, 682, 683, 684, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 885, 886, and 1030.

Conditions 1 through 19 on permit unit 994.

Conditions 1 through 20 for permit units S-1547-913, -914, -915, & -1022.

Conditions 1 through 11 for permit units S-1547-699, -700, & -911.

Conditions 1 through 10 for permit unit S-1547-703.

Conditions 4 through 14 for permit unit S-1547-864.

Conditions 16 through 34 for permit units S-1547-359 & -912.

Conditions 4 through 22 for permit unit S-1547-638.

Conditions 13 through 30 for permit unit S-1547-704.

Conditions 5 through 23 for permit units S-1547-707 & -823.

Conditions 3 through 21 for permit unit S-1547-708.

Conditions 23 through 41 for permit unit S-1547-714.

Conditions 22 through 40 for permit unit S-1547-819.

Conditions 8 through 25 for permit units S-1547-820 & -821.

## **VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES**

### **A. SVJ-UM-0-0<sup>0</sup>**

District Rule 1100, Equipment Breakdown (as amended December 17, 1992)

District Rule 1160, Emission Statements (as adopted November 18, 1992)

District Rule 2010, Permits Required (as amended December 17, 1992)

District Rule 2020, Exemptions (as amended July 21, 1994)

District Rule 2031, Transfer of Permits (as amended December 17, 1992)

District Rule 2040, Applications (as amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (as amended December 17, 1992)

District Rule 2080, Conditional Approval (as amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits, Sections 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0 (adopted June 15, 1995)

District Rule 4101, Visible Emissions (as amended December 17, 1992)

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<sup>0</sup> The Umbrella General Permit Template addressed these requirements for all permit units at the facility

District Rule 4601, Architectural Coatings (as amended December 17, 1992)

District Rules 8020, 8030, and 8060, Fugitive Dust (PM<sub>10</sub>) Emissions (as amended April 25, 1996)

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR Part 82, Stratospheric Ozone, Subpart F

**B. SJV-BSG-13-0, -15-0, -17-0 and -19-0; SVJ-GS-1-0; SJV-IC-1-0 and -2-0; SJV-WV-1-0; and SJV-SU-1-0**

Kern County Rule 407, Sulfur Compounds<sup>1</sup>

Kern County Rule 407.2, Fuel Burning Equipment<sup>2</sup>

Kern County Rule 424, Sulfur Compound from Oil Field Steam Generator<sup>3</sup>

District Rule 1081, Source Sampling (as amended December 16, 1993) (Non SIP replacement for Kern County Rule 108.1)<sup>4</sup>

District Rule 2520, Federally Mandated Operating Permits, Sections 9.1, 9.4.2, 9.5.2, and 13.2 (adopted June 15, 1995)<sup>5</sup>

District Rule 4201, Particulate Matter Concentration (as amended December 17, 1992)<sup>1</sup>

District Rule 4301, Fuel Burning Equipment (as amended December 17, 1992)<sup>2</sup>

District Rule 4401, Steam-Enhanced Crude Oil Production Well Vent (as amended January 15, 1998)<sup>6</sup>

District Rule 4402, Crude Oil Production Sumps (as amended December 17, 1992)<sup>7</sup>

District Rule 4621, Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (as amended May 20, 1993)<sup>8</sup>

District Rule 4622, Transfer of Gasoline Into Vehicle Fuel Tanks (as amended February 17, 1994)<sup>8</sup>

40 CFR 60 Subpart Dc Standards of Performance for Industrial-Commercial-Institutional Small Steam Generator, Section 60.40(c)<sup>9</sup>

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<sup>1</sup> Model General Permit Template SJV-BSG-13-0, -15-0, -17-0 and -19-0; SJV-IC-1-0 and -2-0; addressed this requirement only for steam generators (see section IV for unit designations), and internal combustion engines (S-1547-699-0, -700-0, -703-0, and -911-0)

<sup>2</sup> Model General Permit Template SJV-BSG-13-0, -15-0, -17-0 and -19-0 addressed this requirement only for steam generators (see section IV for unit designations)

<sup>3</sup> Model General Permit Template SJV-BSG-13-0 and -15-0 addressed this requirement only for steam generators (see section IV for unit designations)

<sup>4</sup> Model General Permit Template SJV-BSG-13-0, -15-0, -17-0 and -19-0; SJV-WV-1-0 addressed this requirement only for steam generators (see section IV for unit designations), well vents (S-1547-359-10, -638-3, -704-3, -707-3, -708-2, -714-0, -819-0, -820-0, -821-0, -823-0, and -912-0)

<sup>5</sup> Model General Permit Template SJV-BSG-13-0, -15-0, -17-0 and -19-0; SJV-IC-1-0 and -2-0; SJV-GS-1-0; SJV-WV-1-0 addressed this requirement only for steam generators (see section IV for unit designations), and internal combustion engines (S-1547-699-0, -700-0, -703-0, and -911-0), and gasoline dispensing for units S-1547-913-2, -914-2, -915-2, -1022-2, and well vents (S-1547-359-10, -638-3, -704-3, -707-3, -708-2, -714-0, -819-0, -820-0, -821-0, -823-0, and -912-0)

<sup>6</sup> Model General Permit Template SJV-WV-1-0 addressed this requirement only for well vents (S-1547-359-10, -638-3, -704-3, -707-3, -708-2, -714-0, -819-0, -820-0, -821-0, -823-0, -838-1, and -912-0)

<sup>7</sup> Model General Permit Template SJV-SU-1-0 addressed this requirement for permit unit S-1547-864-0

<sup>8</sup> Model General Permit Template SJV-GS-1-0 addressed this requirement only for gasoline dispensing for units S-1547-913-2, -914-2, -915-2, -1022-2

<sup>9</sup> Model General Permit Template SJV-BSG-15-0 and -19-0 addressed this requirement only for steam generators (see section IV for unit designations)

## VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

### District New and Modified Stationary Source Review Rule

District Rule 1080, Stack Monitoring (as amended December 17, 1992)

District Rule 1081, Source Sampling (as amended December 16, 1993) (Non SIP replacement for Kern County Rule 108.1)

District Rule 4201 Particulate Matter Concentration (as amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits, Sections 9.4.2, 9.5.2, and 13.2 (adopted June 15, 1995)<sup>10</sup>

District Rule 4305, Boilers, Steam Generators and Process Heaters (Amended December 19, 1996)

District Rule 4401 Steam-Enhanced Crude Oil Production Well Vent (as amended January 15, 1998)

District Rule 4622, Transfer of Gasoline Into Vehicle Fuel Tanks (as amended February 17, 1994)

District Rule 4623, Storage of Organic Liquids, (as amended December 20, 2001)

District Rule 4701, Internal Combustion Engines, (as amended November 12, 1998)

District Rule 4703, Stationary Gas Turbines, (as amended February 15, 1996)

District Rule 4801, Sulfur Compounds, (as amended December 17, 1992)

40 CFR 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids

40 CFR 60, Subpart GG, Standards of Performance of Stationary Gas Turbines

40 CFR Part 52 Subpart A Prevention of Significant Deterioration of Air Quality

## VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

- District Rule 4102, Nuisance (Amended December 17, 1992)

For this facility, condition 40 of the facility wide requirements for permit unit S-1547-0-1 is based on the rules listed above and is not Federally Enforceable through Title V.

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<sup>10</sup> Model General Permit Template SJV-BSG-13-0, -15-0, -17-0 and -19-0; SJV-IC-1-0 and -2-0; SJV-GS-1-0; SJV-WV-1-0 addressed this requirement only for steam generators (see section IV for unit designations), and internal combustion engines (S-1547-699-0, -700-0, -703-0, and -911-0), and gasoline dispensing for units S-1547-913-2, -914-2, -915-2, -1022-2, and tanks (see section IV for unit designations), and well vents (S-1547-359-10, -638-3, -704-3, -707-3, -708-2, -714-0, -819-0, -820-0, -821-0, -823-0, and -912-0)

## IX. COMPLIANCE

### A. Requirements Addressed by Model General Permit Templates

#### 1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements S-1547-0-1 as condition numbers 1 through 39 to assure compliance with these requirements.

#### 2. Boilers, Steam Generators, and Heater Treaters

- a. The applicant is proposing to use general permit templates to address federally applicable requirements for some of the boilers, steam generators, and Heater Treaters. Section IV of template SJV-BSG-13-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit units 168, 175, 176 as condition numbers 1 through 16 to assure compliance with these requirements.

Due to more stringent conditions on the existing Permits To Operate (PTOs) 168, 175, 176, general permit template conditions 6, 11, 12, and 14 have been streamlined in, and general permit template conditions 5, 10, and 15 have been deleted from the template requirements for these permit units.

- b. The applicant is proposing to use general permit templates to address federally applicable requirements for some of the boilers, steam generators, and Heater Treaters. Section IV of template SJV-BSG-15-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit units 1, 3, 7, 10, 13, 16, 17, 22, 24, 40, 70, 173, 174, 189, 190, 234, 238, 248, 709, 719, 722, 723, 725, 726, 727, 728, 729, 733, 734, 735, 736, 737, 738, 742, 743, 744, 745, 746, 747, 748, 749, and 751 as condition numbers 1 through 15 to assure compliance with these requirements.

Due to more stringent conditions on the existing Permits To Operate (PTOs) 1, 3, 7, 10, 13, 16, 17, 22, 24, 40, 70, 173, 174, 189, 190, 234, 238, 248, 709, 719, 722, 723, 725, 726, 727, 728, 729, 733, 734, 735, 736, 737, 738, 742, 743, 744, 745, 746, 747, 748, 749, and 751, general permit template conditions 5 and 16 have been streamlined in, and general permit template conditions 1, 6, 8, 11, 15, 17, 18, 19, and 20 have been deleted from the template requirements for these permit units.

- c. The applicant is proposing to use general permit templates to address federally applicable requirements for some of the boilers, steam generators, and Heater Treaters. Section IV of template SJV-BSG-17-0 includes a demonstration of compliance for applicable requirements.



To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit units [92, 94, 95, 96, 114, 116, 118, 125, 156, 167, 128, 130, 134, 139, 251, 252, 569, 663, 666, and 697](#) as condition numbers [1 through 14](#) to assure compliance with these requirements.

Due to more stringent conditions on the existing Permits To Operate (PTOs) [92, 94, 95, 96, 114, 116, 118, 125, 156, 167, 128, 130, 134, 139, 251, 252, 569, 663, 666, and 697](#), general permit template conditions [6, 11, 12 and 13](#) have been streamlined in, and general permit template conditions [5, 10 and 14](#) have been deleted from the template requirements for these permit units.

- d. The applicant is proposing to use general permit templates to address federally applicable requirements for some of the boilers, steam generators, and Heater Treaters. Section IV of template SJV-BSG-19-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit units [59, 60, 61, 62, 65, 66, 74, 75, 76, 77, 78, 86, 87, 121, 122, 123, 141, 142, 143, 144, 145, 146, 152, 157, 158, 159, 164, 241, 242, 243, 244, 245, 250, 355, 361, 362, 363, 656, 657, 681, 682, 683, 684, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 885, 886, 1030](#) as condition numbers [1 through 14](#) to assure compliance with these requirements.

Due to more stringent conditions on the existing Permits To Operate (PTOs) [59, 60, 61, 62, 65, 66, 74, 75, 76, 77, 78, 86, 87, 121, 122, 123, 141, 142, 143, 144, 145, 146, 152, 157, 158, 159, 164, 241, 242, 243, 244, 245, 250, 355, 361, 362, 363, 656, 657, 681, 682, 683, 684, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 885, 886, 1030](#), general permit template conditions [5, 9 and 15](#) have been streamlined in, and general permit template conditions [1, 6, 8, 10, 14, 16, 17, 18, and 19](#) have been deleted from the template requirements for these permit units.

- e. The applicant is proposing to use general permit templates to address federally applicable requirements for some of the boilers, steam generators, and Heater Treaters. Section IV of template SJV-BSG-22-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit unit [994](#) as condition numbers [1 through 19](#) to assure compliance with these requirements.

Due to more stringent conditions on the existing Permit To Operate (PTO) [994](#), general permit template conditions [6, 11, 12 and 18](#) have been streamlined in, and general permit template conditions [5, 10 and 19](#) have been deleted from the template requirements for this permit unit.

3. Gasoline Dispensing Units.

The applicant is proposing to use general permit template to address federally applicable requirements for units S-1547-913, -914, -915, and -1022. Section IV of template SJV-GS-1-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for these permit units as condition numbers [1 through 20](#) to assure compliance with these requirements.

4. IC Engine Units.

The applicant is proposing to use general permit template to address federally applicable requirements for units S-1547-699, -700, -703, & -911. Section IV of templates SJV-IC-1-0 and SJV-IC-2-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit units S-1547-699, -700, & -911 as condition numbers [1 through 11](#) and for permit unit S-1547-703 as conditions 1 through 10 to assure compliance with these requirements.

5. Sump Units.

The applicant is proposing to use general permit template to address federally applicable requirements for unit S-1547-864. Section IV of template SJV-SU-1-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for these permit units as condition numbers [4 through 14](#) to assure compliance with these requirements.

6. Well Vent Units.

The applicant is proposing to use general permit template to address federally applicable requirements for units S-1547-359, -638, -704, -707, -708, -714, -819, -820, -821, -823, and -912. Section IV of template SJV-WV-1-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for these permit units as following to assure compliance with these requirements.

Conditions 16 through 34 for permit units S-1547-359 & -912.  
Conditions 4 through 22 for permit unit S-1547-638.  
Conditions 13 through 30 for permit unit S-1547-704.  
Conditions 5 through 23 for permit units S-1547-707 & -823.  
Conditions 3 through 21 for permit unit S-1547-708.  
Conditions 23 through 41 for permit unit S-1547-714.  
Conditions 22 through 40 for permit unit S-1547-819.

Conditions 8 through 25 for permit units S-1547-820 & -821.

**B. Requirements Not Addressed by Model General Permit Templates**

**1. New and Modified Stationary Source Review Rule (District NSR Rule)**

**A. Tanks, Wemcos etc.**

**a. 21,000 Gallon Diluted Heavy Crude Wet Tank (S-1547-214-4)**

Permit unit S-1547-213 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by condition 1 of the requirements for this permit unit. True vapor pressure is revised to 0.5 psia to comply with District Rule 4623.
- Conditions 2 through 6 of the PTO are included as conditions 2 through 6 of the requirements for this permit unit.
- Condition 7 of the PTO is subsumed by condition 7 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 10 of the requirements for this permit unit

**b. 1,260,000 Gallon Floating Roof Wet Crude Oil Tank (S-1547-223-1)**

Permit unit S-1547-223 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 2 through 5 of the requirements for this permit unit.
- Condition 5 of the PTO is subsumed by condition 8 of the requirements for this permit unit.
- Conditions 6 and 7 of the PTO are subsumed by condition 9 of the requirements for this permit unit.
- Conditions 8 through 11 of the PTO are included as conditions 10 through 13 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 18 of the requirements for this permit unit.
- Condition 13 of the PTO is subsumed by conditions 14 and 17 of the requirements for this permit unit.
- Conditions 14 and 15 of the PTO are included as conditions 19 and 20 of the requirements for this permit unit.
- Conditions 16 and 17 of the PTO are included as condition 23 of the requirements for this permit unit.

- Condition 18 of the PTO is included as condition 22 of the requirements for this permit unit.
- Condition 19 of the PTO is included as condition 41 of the requirements for this permit unit.

c. 4,200,000 Gallon External Floating Roof Crude Oil Storage Tank (S-1547-260-1)

Permit unit S-1547-260 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by condition 3 of the requirements for this permit unit.
- Conditions 2 and 3 of the PTO are subsumed by condition 4 of the requirements for this permit unit.
- Conditions 4 through 6 of the PTO are included as conditions 5 through 7 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 14 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 13 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by conditions 9 and 12 of the requirements for this permit unit.
- Conditions 11 and 12 of the PTO are subsumed by conditions 18 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 17 of the requirements for this permit unit.
- Condition 14 of the PTO is included as condition 36 of the requirements for this permit unit.

d. 4,200,000 Gallon External Floating Roof Crude Oil Storage Tank (S-1547-261-1)

Permit unit S-1547-261 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by condition 3 of the requirements for this permit unit.
- Conditions 2 and 3 of the PTO are subsumed by condition 4 of the requirements for this permit unit.
- Conditions 4 through 6 of the PTO are included as conditions 5 through 7 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 14 of the requirements for this permit unit.

- Condition 8 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 13 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by conditions 9 and 12 of the requirements for this permit unit.
- Conditions 11 and 12 of the PTO are subsumed by conditions 18 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 17 of the requirements for this permit unit.
- Condition 14 of the PTO is included as condition 36 of the requirements for this permit unit.

e. 5,250,000 Gallon Double Deck Floating Roof Crude Oil Storage Tank (S-1547-350-1)

Permit unit S-1547-350 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by condition 6 of the requirements for this permit unit.
- Conditions 2 and 3 of the PTO are subsumed by condition 7 of the requirements for this permit unit.
- Conditions 4 through 8 of the PTO are included as conditions 8 through 16 of the requirements for this permit unit.
- Condition 9 of the PTO is subsumed by conditions 12 and 15 of the requirements for this permit unit.
- Conditions 10 and 11 of the PTO are included as conditions 17 and 18 of the requirements for this permit unit.
- Conditions 12 and 13 of the PTO are subsumed by condition 21 of the requirements for this permit unit.
- Condition 14 of the PTO is included as condition 20 of the requirements for this permit unit.
- Condition 15 of the PTO is subsumed by condition 6 of the requirements for this permit unit.
- Condition 16 of the PTO is included as condition 14 of the requirements for this permit unit.
- Conditions 17 through 19 of the PTO are included as 1 through 3 of the requirements for this permit unit.
- Condition 20 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 21 of the PTO is included as condition 39 of the requirements for this permit unit.

f. 504,000 Gallon Fixed Roof Tank (S-1547-353-11)

Permit unit S-1547-353 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995,

conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 22 of the facility-wide requirements.
- Conditions 2 through 12 of the PTO are included as conditions 1 through 11 of the requirements for this permit unit.
- Condition 13 of the PTO is subsumed by condition 24 of the requirements for this permit unit.

g. 28,560 Gallon Cone Roof Crude Oil Surge Tank (S-1547-377-4)

Permit unit S-1547-377 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 of the PTO are included as conditions 1 through 11 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by condition 14 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 13 of the requirements for this permit unit.
- Condition 14 of the PTO is included as condition 12 of the requirements for this permit unit.
- Condition 15 of the PTO is included as condition 24 of the requirements for this permit unit.

h. 28,560 Gallon Cone Roof Crude Oil Surge Tank (S-1547-378-2)

Permit unit S-1547-378 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

i. 210,000 Gallon Cone Roof Crude Oil Stock Tank (S-1547-379-2)

Permit unit S-1547-379 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

j. 210,000 Gallon Cone Roof Crude Stock Tank (S-1547-380-2)

Permit unit S-1547-380 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

k. 210,000 Gallon Cone Roof Crude Stock Tank (S-1547-381-2)

Permit unit S-1547-381 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 of the PTO are included as conditions 1 through 3 of the requirements for this permit unit.
- Condition 4 of the PTO is subsumed by condition 2 of the requirements for this permit unit.
- Conditions 5 through 10 of the PTO are included as conditions 4 through 9.

I. 21,000 Gallon Cone Roof Skim Oil Tank (S-1547-383-3)

Permit unit S-1547-383 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

m. 2,730,000 Gallon Fixed Roof Petroleum Storage Tank (S-1547-384-1)

Permit unit S-1547-384 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 18 of the requirements for this permit unit.

n. 504,000 Gallon Clarifier Tanks (S-1547-397-3, -398-3, -399-3, -400-3, and -401-3)

Permit units S-1547-397, -398, -399, -400, and -401 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 1 and 2 of the requirements for this permit unit.



o. 504,000 Gallon Dehydration Tanks (S-1547-393-3, -394-3, -395-3, and -396-3)

Permit units S-1547-393, -394, -395, and -396 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 1 and 2 of the requirements for this permit unit.

p. 1,680,000 Gallon Surge Tank (S-1547-402-3)

Permit unit S-1547-402 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 1 and 2 of the requirements for this permit unit.

q. 344,400 Gallon De-Gassing Tank (S-1547-405-3 and -406-3)

Permit units S-1547-405, and -406 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.

r. 126,000 Gallon Cone Roof Clarifier Tank (S-1547-407-1)

Permit unit S-1547-407 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.

- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

s. 126,000 Gallon Cone Roof Clarifier Tank (S-1547-408-1)

Permit unit S-1547-408 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

t. 84,000 Gallon Cone Roof Filter Tank (S-1547-410-1)

Permit unit S-1547-410 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

u. 84,000 Gallon Cone Roof Filter Water Tank (S-1547-411-1)

Permit unit S-1547-411 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements.
- Conditions 2 through 9 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 21 of the requirements for this permit unit.

v. Wemco Air Flotation Cell Model 120 (S-1547-413-1)

Permit unit S-1547-413 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.

w. Wemco Model 120X Air Floatation Unit (S-1547-423-3)

Permit Unit S-1547-423 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.

x. 210,000 Crude Oil Shipping Tank (S-1547-424-2 and -425-2)

Permit units S-1547-424, and -425 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.

y. Wemco Oil/Water Separators (S-1547-430-2, -431-2, -432-2, -433-2, and -434-2)

Permit units S-1547-430, -431, -432, -433, and -434 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications,

dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 1 and 2 of the requirements for this permit unit.
- Condition 3 of the PTO is subsumed by condition 3 of the requirements for this permit unit.

z. Wemco Oil/Water Separator (S-1547-441-4)

Permit unit S-1547-441 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 14 of the PTO are included as conditions 1 through 14 of the requirements for this permit unit.
- Condition 15 of the PTO is included as condition 24 of the requirements for this permit unit.

aa. 4,200 Gallon Fixed Roof Skim Tank (S-1547-442-2)

Permit unit S-1547-442 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 11 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 10 of the requirements for this permit unit.
- Conditions 5 through 10 of the PTO are included as conditions 2 through 7 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by conditions 20 and 23 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 24 of the requirements for this permit unit.

bb. 84,000 Gallon Fixed Roof Surge Tank (S-1547-443-3)

Permit unit S-1547-443 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 4 of the PTO is subsumed by condition 12 of the requirements for this permit unit.
- Condition 5 of the PTO is subsumed by condition 11 of the requirements for this permit unit.
- Conditions 6 through 11 of the PTO are included as conditions 2 through 7 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by conditions 21 and 23 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 25 of the requirements for this permit unit.

cc. 3,000 BBL Constant Level Fixed Roof Clarifier Tank (S-1547-460-4)

Permit unit S-1547-460 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 9 of the PTO is subsumed by conditions 20 and 23 of the requirements for this permit unit.

dd. 42,000 Gallon Fixed Roof Petroleum Reject Tank (S-1547-461-2)

Permit unit S-1547-461 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 6 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 7 of the requirements for this permit unit.
- Conditions 5 and 6 of the PTO are included as conditions 1 and 2 of the requirements for this permit unit.
- Condition 7 of the PTO is subsumed by condition 11 of the requirements for this permit unit.

- Condition 1 of the PTO is included as condition 5 of the requirements for this permit unit.
- Conditions 8 and 9 of the PTO are included as conditions 8 and 9 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by conditions 20 and 23 of the requirements for this permit unit.

ee. 21,000 Gallon Fixed Roof Petroleum Sand Tank (S-1547-462-2)

Permit unit S-1547-462 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 10 of the requirements for this permit unit.
- Conditions 5 and 6 of the PTO are included as conditions 6 and 7 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 19 of the requirements for this permit unit.
- Condition 10 of the PTO is included as condition 4 of the requirements for this permit unit.

ff. 126,000 Gallon Fixed Roof Petroleum Stock Tank (S-1547-465-2)

Permit unit S-1547-465 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 6 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 7 of the requirements for this permit unit.

- Condition 5 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 11 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 10 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by condition 19 of the requirements for this permit unit.

gg. 70,000 Gallon Fixed Roof Tank (S-1547-479-1)

Permit unit S-1547-479 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

hh. Wemco Oil/Water Separator (S-1547-489-1)

Permit unit S-1547-489 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

ii. 84,000 Gallon Fixed Roof Waste Fluid Clarifier Tank (S-1547-491-1)

Permit unit S-1547-491 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

jj. 126,000 Gallon Fixed Roof Produced Water Tank (S-1547-500-1)

Permit unit S-1547-500 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

kk. 5000 BBL Fixed Roof Petroleum Storage Tank (S-1547-584-6)

Permit unit S-1547-584 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 11 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 2 of the requirements for this permit unit.
- Conditions 7, 8, and 9 of the PTO are included as conditions 4, 5, and 6 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 20 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by condition 24 of the requirements for this permit unit.

ll. 5000 BBL Fixed Roof Petroleum Storage Tank (S-1547-585-2)

Permit unit S-1547-585 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 11 of the requirements for this permit unit.



- Condition 3 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 4 of the requirements for this permit unit.
- Conditions 8, 9, and 10 of the PTO are included as conditions 6, 7, and 8 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by condition 20 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by condition 24 of the requirements for this permit unit.

mm. 84,000 Gallon Fixed Roof Produced Water Tank (S-1547-586-2)

Permit unit S-1547-586 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are subsumed by condition 9 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 5 of the requirements for this permit unit.
- Conditions 5, 6, and 7 of the PTO are included as conditions 1, 2, and 3 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 6 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 18 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by condition 22 of the requirements for this permit unit.

nn. 84,000 Gallon Fixed Roof Stock Tank (S-1547-587-2)

Permit unit S-1547-587 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are subsumed by condition 9 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 6 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by condition 18 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by condition 22 of the requirements for this permit unit.

oo. 4 MMBtu/hr John Zink Standby Flare (S-1547-588-4)

Permit unit S-1547-588 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 22 of the facility-wide requirements.
- Condition 2 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 4 of the requirements for this permit unit.

pp. 42,000 Gallon Fixed Roof Petroleum Storage Tank (S-1547-604-1)

Permit unit S-1547-604 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

qq. 10,500 Gallon Fixed Roof Petroleum Storage Tank (S-1547-605-1 and -606-1)

Permit units S-1547-605 and -606 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

rr. 84,000 Gallon Fixed Roof Petroleum Storage Tank (S-1547-607-1)

Permit unit S-1547-607 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

ss. 42,000 Gallon Fixed Roof Petroleum Storage Tank (S-1547-623-1)

Permit unit S-1547-623 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

tt. 42,000 Gallon Fixed Roof Petroleum Wash Tank (S-1547-627-1)

Permit unit S-1547-627 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

uu. 42,000 Gallon Fixed Roof Petroleum Storage Tank (S-1547-628-1)

Permit unit S-1547-628 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

vv. 21,000 Gallon Fixed Roof Petroleum Storage Tank (S-1547-629-1)

Permit unit S-1547-629 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

ww. 10,500 Gallon Fixed Roof Petroleum Wash Tank (S-1547-630-1)

Permit unit S-1547-630 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO refers to the facility-wide requirements S-1547-0-0, which are included as conditions 22, 40, 42, and 43 of the facility-wide requirements S-1547-0-1.

xx. 1,260,000 Gallon External Floating Roof Tank (S-1547-639-4)

Permit unit S-1547-639 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 2 and 1 of the requirements for this permit unit.
- Conditions 3 and 4 of the PTO are included as conditions 3 and 4 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 8 of the requirements for this permit unit.

- Conditions 6 and 7 of the PTO are included as condition 9 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 20 of the requirements for this permit unit.
- Condition 10 of the PTO is included as condition 19 of the requirements for this permit unit.
- Conditions 11 and 12 of the PTO are subsumed by conditions 11 and 12 of the requirements for this permit unit.
- Conditions 13 and 14 of the PTO are included as conditions 5 and 41 of the requirements for this permit unit.
- Condition 14 of the PTO is subsumed by condition 9 of the facility-wide requirements.

yy. 210,000 Gallon Fixed Roof Crude Oil Tank (S-1547-634-7)

Permit unit S-1547-634 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.
- Condition 6 of the PTO is subsumed by condition 23 of the requirements for this permit unit.
- Conditions 7 through 19 of the PTO are included as conditions 6 through 18 of the requirements for this permit unit.
- Condition 20 of the PTO is included as condition 34 of the requirements for this permit unit.
- Condition 21 of the PTO is included as condition 19 of the requirements for this permit unit.
- Condition 22 of the PTO is included as condition 35 of the requirements for this permit unit.

zz. 84,000 Gallon Fixed Roof Crude Oil Tank (S-1547-644-2)

Permit unit S-1547-644 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.
- Condition 6 of the PTO is subsumed by conditions 17 and 20 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 21 of the requirements for this permit unit.

aaa. 84,000 Gallon Fixed Roof Crude Oil Tanks (S-1547-645-2, -648-2, and -649-2)

Permit units S-1547-645, -648, and -649 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.
- Condition 6 of the PTO is subsumed by condition 20 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 21 of the requirements for this permit unit.

bbb. 210,000 Gallon Fixed Roof Crude Oil Tank (S-1547-647-2 and -652-2)

Permit unit S-1547-647, and -652 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.
- Condition 6 of the PTO is subsumed by conditions 17 and 20 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 21 of the requirements for this permit unit.

ccc. 21,000 Gallon Fixed Roof Crude Oil Tank (S-1547-653-2 and -654-3)

Permit units S-1547-653, and -654 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.
- Condition 6 of the PTO is subsumed by conditions 17 and 20 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 21 of the requirements for this permit unit.

ddd. 8.33 MMBtu/hr John Zink Back-Up Flare (S-1547-655-5)

Permit unit S-1547-655 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 22 of the facility-wide requirements.
- Conditions 2 through 8 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.

eee. 210,000 Gallon Fixed Roof Crude Oil Treating Tank (S-1547-658-2)

Permit unit S-1547-587 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 11 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 7 of the PTO is an error and has been deleted.
- Condition 8 of the PTO is included as condition 4 of the requirements for this permit unit.
- Conditions 9, 10, and 11 of the PTO are included as conditions 6, 7, and 8 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by condition 20 of the requirements for this permit unit.
- Condition 13 of the PTO is subsumed by condition 23 of the requirements for this permit unit.

fff. 126,000 Gallon Fixed Roof Crude Oil Tank (S-1547-687-2)

Permit unit S-1547-687 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 10 of the PTO are included as conditions 1 through 10 of the requirements for this permit unit.
- Conditions 11 and 12 of the PTO are included as conditions 25 and 26 of the requirements for this permit unit.

ggg. 126,000 Gallon Fixed Roof Crude Oil Tank (S-1547-688-1)

Permit unit S-1547-688 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 6 of the PTO are included as conditions 1 through 6 of the requirements for this permit unit.
- Conditions 7 and 8 of the PTO are included as conditions 18 and 22 of the requirements for this permit unit.

hhh. 10,500 Gallon Fixed Roof Crude Oil Tank (S-1547-689-1 and -690-1)

Permit units S-1547-689, and -690 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 6 of the PTO are included as conditions 1 through 6 of the requirements for this permit unit.
- Conditions 7 and 8 of the PTO are included as conditions 18 and 22 of the requirements for this permit unit.

iii. 84,000 Gallon Fixed Roof Water Tank (S-1547-691-1 and -692-1)

Permit units S-1547-691, and -692 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.

jjj. 210,000 Gallon Fixed Roof Soft Water Tank (S-1547-693-1 and -694-1)

Permit units S-1547-693, and -694 were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.



kkk. 1000 BBL Welded Steel Petroleum Wash Tank (S-1547-705-1)

Permit unit S-1547-705 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is included as condition 6 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 5 of the requirements for this permit unit.
- Conditions 4 through 6 of the PTO are included as conditions 2 through 4 of the requirements for this permit unit.
- Condition 7 of the PTO is subsumed by condition 16 of the requirements for this permit unit.

III. 126,000 Gallons Produced Water Tank (S-1547-843-1)

Permit unit S-1547-843 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.
- Conditions 8 & 9 of the PTO are subsumed by conditions 14 & 15 of the requirements for this permit unit.
- Conditions 10 through 14 of the PTO are included as conditions 8 through 12 of the requirements for this permit unit.
- Condition 15 of the PTO is subsumed by conditions 25 & 27 of the requirements for this permit unit.

mmm. 126,000 Gallon Fixed Roof Tanks (S-1547-844-1, -845-1, -846-1, -847-1, -848-1, -849-1, -850-1, -851-1, -852-1, and -853-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 & 2 of the PTO are included as conditions 1 & 2 of the requirements for these permit units.
- Conditions 3 & 4 of the PTO are subsumed by conditions 7 & 8 of the requirements for these permit units.
- Conditions 5 through 7 of the PTO are included as conditions 3 through 5 of the requirements for these permit units.

- Condition 8 of the PTO is subsumed by conditions 18 & 20 of the requirements for these permit units.

nnn. 126,000 Gallons Produced Water Tank (S-1547-854-1)

Permit unit S-1547-854 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 of the PTO are included as conditions 1 through 11 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by conditions 24 & 26 of the requirements for this permit unit.
- Condition 13 of the PTO is subsumed by condition 27 of the requirements for this permit unit.

ooo. 126,000 Gallon Fixed Roof Tanks (S-1547-855-1, -856-1, -857-1, -858-1, -859-1, -860-1, and -861-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 & 2 of the PTO are included as conditions 1 & 2 of the requirements for these permit units.
- Conditions 3 & 4 of the PTO are subsumed by conditions 9 & 10 of the requirements for these permit units.
- Conditions 5 through 9 of the PTO are included as conditions 3 through 7 of the requirements for these permit units.
- Condition 10 of the PTO is subsumed by conditions 20 & 22 of the requirements for these permit units.
- Condition 11 of the PTO is subsumed by condition 23 of the requirements for this permit unit.

ppp. Wemco Units (S-1547-862-1 and -863-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8 of the PTO are included as conditions 1 through 8 of the requirements for these permit units.
- Condition 9 of the PTO is included as condition 18 of the requirements for these permit units.
- Condition 11 of the PTO is subsumed by condition 19 of the requirements for this permit unit.

qqq. 210,000 Gallons Fixed Roof Tank (S-1547-865-1)

Permit unit S-1547-865 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 13 of the PTO are included as conditions 1 through 13 of the requirements for this permit unit.
- Condition 14 of the PTO is subsumed by conditions 28 & 30 of the requirements for this permit unit.
- Conditions 15 & 16 of the PTO are included as conditions 14 & 15 of the requirements for this permit unit.

rrr. 210,000 Gallon Fixed Roof Tanks (S-1547-860-1, -867-1, -868-1, -869-1, -870-1, -871-1, -872-1, -873-1, -874-1, and -875-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 10 of the PTO are included as conditions 1 through 10 of the requirements for these permit units.
- Condition 11 of the PTO is subsumed by conditions 24 & 26 of the requirements for these permit units.
- Condition 12 of the PTO is included as condition 11 of the requirements for these permit units.

sss. Wemco Units (S-1547-876-1 and -877-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for these permit units.

ttt. Wemco Units (S-1547-882-1 and -883-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 1 and 2 of the requirements for these permit units.
- Condition 3 of the PTO is subsumed by conditions 4 & 8 of the requirements for these permit units.
- Condition 4 of the PTO is included as condition 3 of the requirements for these permit units.

uuu. 84,000 Gallons Fixed Roof Tank (S-1547-884-1)

Permit unit S-1547-884 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Conditions 2 & 3 of the PTO are subsumed by conditions 12 & 13 of the requirements for this permit unit.
- Conditions 4 through 9 of the PTO are included as conditions 2 through 6 of the requirements for this permit unit.
- Conditions 10 & 11 of the PTO are included as condition 7 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by conditions 24 & 25 of the requirements for this permit unit.
- Conditions 13 through 15 of the PTO are included as conditions 8 through 10 of the requirements for this permit unit.

vvv. 315,000 Gallon Fixed Roof Tanks (S-1547-888-1, -889-1, -944-1, -945-1, -948-1, -949-1, -950-1, -1014-1, and -1015-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for these permit units.
- Condition 8 of the PTO is subsumed by conditions 20 & 22 of the requirements for these permit units.
- Condition 9 of the PTO is subsumed by condition 23 of the requirements for these permit units.

www. Wemco Units (S-1547-890-1 and -891-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for these permit units.
- Condition 2 of the PTO is subsumed by conditions 7 & 11 of the requirements for these permit units.
- Conditions 3 through 7 of the PTO are included as conditions 2 through 6 of the requirements for these permit units.
- Condition 8 of the PTO is subsumed by condition 16 of the requirements for these permit units.

xxx. Wemco Units (S-1547-892-1 through -897-1 and -906-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for these permit units.
- Condition 2 of the PTO is subsumed by conditions 8 & 11 of the requirements for these permit units.
- Conditions 3 through 7 of the PTO are included as conditions 2 through 6 of the requirements for these permit units.

yyy. Wemco Units (S-1547-898-1, -899-1, and -902-1 through -905-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for these permit units.
- Condition 2 of the PTO is subsumed by conditions 7 & 10 of the requirements for these permit units.
- Conditions 3 through 6 of the PTO are included as conditions 2 through 5 of the requirements for these permit units.

zzz. 210,000 Gallon Fixed Roof Tanks (S-1547-946-1, -947-1, and -951-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 6 of the PTO are included as conditions 1 through 6 of the requirements for these permit units.
- Condition 7 of the PTO is subsumed by conditions 19 & 21 of the requirements for these permit units.

- Condition 8 of the PTO is subsumed by condition 22 of the requirements for these permit units.

aaaa. 42,000 Gallon Fixed Roof Tanks (S-1547-958-1 and -961-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for these permit units.
- Condition 2 of the PTO is subsumed by condition 18 of the requirements for these permit units.
- Conditions 3 through 6 of the PTO are included as conditions 2 through 5 of the requirements for these permit units.
- Condition 7 of the PTO is subsumed by conditions 24 & 26 of the requirements for these permit units.
- Conditions 8 through 13 of the PTO are included as conditions 6 through 11 of the requirements for these permit units.
- Condition 14 of the PTO is subsumed by condition 27 of the requirements for these permit units.

bbbb. Wemco Units (S-1547-1016-1 and -1017-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for these permit units.
- Condition 5 of the PTO is not included in the requirements for these permit units because this requirement is extraneous.
- Condition 6 of the PTO is included as condition 14 of the requirements for these permit units.

cccc. 210,000 Gallons Oil Processing Tank (S-1547-1018-1)

Permit unit S-1547-1018 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 of the PTO are included as conditions 1 through 3 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 6 of the requirements for this permit unit.

- Condition 5 of the PTO is included as condition 25 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 7 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 5 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 10 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 11 of the PTO is not included in the requirements for this permit unit because this condition was redundant.
- Condition 12 of the PTO is included as condition 10 of the requirements for this permit unit.

dddd. Wemco Unit (S-1547-1019-1)

Permit unit S-1547-1019 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is subsumed by conditions 6 & 9 of the requirements for this permit unit.
- Conditions 3 through 5 of the PTO are included as conditions 2 through 4 of the requirements for this permit unit.

eeee. Wemco Unit (S-1547-1023-1)

Permit unit S-1547-1023 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is subsumed by conditions 11 & 14 of the requirements for this permit unit.
- Conditions 3 through 10 of the PTO are included as conditions 2 through 9 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by condition 9 of the facility-wide requirements for this facility.

ffff. Wemco Unit (S-1547-1025-1)

Permit unit S-1547-1025 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 & 2 of the PTO are included as conditions 1 & 2 of the requirements for this permit unit.
- Condition 3 of the PTO is subsumed by conditions 4 & 8 of the requirements for this permit unit.
- Condition 4 of the PTO is included as condition 3 of the requirements for this permit unit.

gggg. 31,500 Gallons Crude Oil Wash Tank (S-1547-1029-2)

Permit unit S-1547-1029 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 of the PTO are included as conditions 1 through 3 of the requirements for this permit unit.
- Condition 4 of the PTO is subsumed by condition 7 of the requirements for this permit unit.
- Condition 5 of the PTO is not included in the requirements for this permit unit because condition is obsolete.

hhhh. 6700 Bbl Crude Oil Wash Tank (S-1547-1064-2)

Permit unit S-1547-1064 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 & 2 of the PTO are subsumed by conditions 3 & 6 of the requirements for this permit unit.
- Conditions 3 & 4 of the PTO are included as conditions 1 & 2 of the requirements for this permit unit.
- Condition 5 of the PTO is subsumed by condition 9 of the facility-wide requirements for this facility.

**B. Well Vents.**

a. Thermally Enhanced Oil Recovery Operation (S-1547-359-8)

Permit unit S-1547-359 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for



streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.
- Conditions 8 and 9 of the PTO are subsumed by conditions 23 & 24 of the requirements for this permit unit.
- Condition 10 of the PTO is subsumed by conditions 25 & 26 of the requirements for this permit unit.
- Conditions 11 and 12 of the PTO are included as conditions 8 and 9 of the requirements for this permit unit.
- Condition 13 of the PTO is subsumed by condition 21 of the requirements for this permit unit.
- Conditions 14 through 18 of the PTO are included as conditions 10 through 14 of the requirements for this permit unit.

b. 20 Uncontrolled Cyclic Wells (S-1547-536-1)

Permit unit S-1547-536 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by condition 22 of the facility-wide requirements for this facility.
- Condition 2 of the PTO is included as condition 1 of the requirements for this permit unit.

c. 361 Closed Vent Cyclic Wells and 5,384 Closed Vent Steam Drive Wells (S-1547-638-5)

Permit unit S-1547-638 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by conditions 9 through 18 of the requirements for this permit unit.
- Conditions 2 & 3 of the PTO are included as conditions 1 & 2 of the requirements for this permit unit.
- Condition 4 of the PTO is subsumed by condition 8 of the requirements for this permit unit

d. Thermally Enhanced Oil Recovery Operation (S-1547-704-1)

Permit unit S-1547-704 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995,

conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.
- Condition 8 of the PTO is subsumed by condition 17 of the requirements for this permit unit.
- Conditions 9 and 10 of the PTO are included as conditions 8 and 9 of the requirements for this permit unit.
- Condition 11 of the PTO is subsumed by conditions 22 and 23 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by condition 19 of the requirements for this permit unit.
- Conditions 13 and 14 of the PTO are included as conditions 10 and 11 of the requirements for this permit unit.

e. Thermally Enhanced Oil Recovery Operation (S-1547-707-1)

Permit unit S-1547-707 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 of the PTO are included as conditions 1 and 2 of the requirements for this permit unit.
- Condition 3 of the PTO is subsumed by condition 10 of the requirements for this permit unit.
- Condition 4 of the PTO is subsumed by conditions 14 through 16 of the requirements for this permit unit.
- Condition 5 of the PTO is included as condition 12 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 3 of the requirements for this permit unit.
- Condition 7 of the PTO is subsumed by conditions 14 through 17 of the requirements for this permit unit.

f. Thermally Enhanced Oil Recovery Operation (S-1547-708-3)

Permit unit S-1547-708 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is subsumed by condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is subsumed by condition 8 of the requirements for this permit unit.
- Condition 3 of the PTO is subsumed by condition 14 of the requirements for this permit unit.

- Condition 4 of the PTO is subsumed by conditions 12, 13, 14, and 18 of the requirements for this permit unit.
- Condition 5 of the PTO is subsumed by condition 10 of the requirements for this permit unit.

g. Thermally Enhanced Oil Recovery Operation (S-1547-714-1)

Permit unit S-1547-714 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.
- Conditions 8 through 10 of the PTO are subsumed by conditions 23 through 33 of the requirements for this permit unit.
- Conditions 11 through 18 of the PTO are included as conditions 8 through 15 of the requirements for this permit unit.
- Condition 19 of the PTO is subsumed by condition 22 of the requirements for this permit unit.
- Condition 20 of the PTO is included as condition 16 of the requirements for this permit unit.

h. Thermally Enhanced Oil Recovery Operation (S-1547-819-1)

Permit unit S-1547-819 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 of the PTO are included as conditions 1 through 3 of the requirements for this permit unit.
- Conditions 4 through 7 of the PTO are subsumed by conditions 27 through 37 of the requirements for this permit unit.
- Conditions 8 through 13 of the PTO are included as conditions 12 through 19 of the requirements for this permit unit.
- Condition 14 of the PTO is subsumed by condition 27 of the requirements for this permit unit.
- Conditions 15 through 25 of the PTO are included as conditions 10 through 20 of the requirements for this permit unit.
- Condition 26 of the PTO is subsumed by condition 26 and 21 of the requirements for this permit unit.

i. Thermally Enhanced Oil Recovery Operations (S-1547-820-1 and -821-1)

Permit units S-1547-820 & -821 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for these permit units.
- Conditions 5 through 8 of the PTO are subsumed by conditions 13 through 23 of the requirements for these permit units.
- Conditions 9 and 10 of the PTO are included as conditions 5 and 6 of the requirements for these permit units.

j. Thermally Enhanced Oil Recovery Operation (S-1547-823-1)

Permit unit S-1547-823 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are subsumed by conditions 10 through 20 of the requirements for this permit unit.
- Conditions 5 through 7 of the PTO are included as conditions 1 through 3 of the requirements for this permit unit.

k. Thermally Enhanced Oil Recovery Operation (S-1547-838-2)

Permit unit S-1547-838 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.

l. Thermally Enhanced Oil Recovery Operation (S-1547-912-1)

Permit unit S-1547-912 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Conditions 2 through 5 of the PTO are subsumed by conditions 21 through 31 of the requirements for this permit unit.
- Conditions 6 through 18 of the PTO are included as conditions 2 through 14 of the requirements for this permit unit.

m. Cyclically Steamed Crude Oil Production Wells With closed Casing Vents (S-1547-1021-1)

Permit unit S-1547-1021 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for

streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.

n. Thermally Enhanced Oil Recovery Operation (S-1547-1063-2)

Permit unit S-1547-1063 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.
- Condition 21 of the PTO is subsumed by condition 26 of the requirements for this permit unit.

o. Thermally Enhanced Oil Recovery Operation (S-1547-1079-6)

Permit unit S-1547-1079 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 of the PTO is subsumed by conditions 10 through 12 of the requirements for this permit unit.
- Conditions 3 through 6 of the PTO are included as conditions 2 through 5 of the requirements for this permit unit.

p. Thermally Enhanced Oil Recovery Operation (S-1547-1092-1)

Permit unit S-1547-1092 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 6 of the requirements for this permit unit.
- Conditions 2 through 5 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.

q. Closed Casing vent Cyclic Wells (S-1547-1093-1)

Permit unit S-1547-1093 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for

streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 2 of the requirements for this permit unit.
- Condition 2 of the PTO is subsumed by conditions 1, 7, 8, 9, and 10 of the requirements for this permit unit.
- Condition 3 of the PTO is included as condition 1 of the requirements for this permit unit.

**C. Sump**

a. Sand Basin (S-1547-864-1)

Permit unit S-1547-864 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.

b. Sand Basin (S-1547-907-1)

Permit unit S-1547-907 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 of the PTO are included as conditions 1 through 3 of the requirements for this permit unit.

**D. Gas Turbines**

a. 21.45 MW Gas Fired Turbine Engine Cogeneration Facility (S-1547-148-12, -149-12, and -151-12)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 4 of the requirements for these permit units.
- Conditions 2 and 3 of the PTO are included as conditions 1 and 2 of the requirements for these permit units.
- Condition 4 of the PTO is subsumed by condition 19 of the requirements for these permit units.

- Condition 5 of the PTO is included as condition 3 of the requirements for these permit units.
- Conditions 6 through 9 of the PTO are included as conditions 5 through 8 of the requirements for these permit units.
- Condition 10 of the PTO is included as condition 23 of the requirements for these permit units.
- Condition 11 of the PTO is subsumed by condition 14 of the requirements for these permit units.
- Condition 12 of the PTO is included as condition 18 of the requirements for these permit units.
- Conditions 13 and 14 of the PTO are included as conditions 21 and 22 of the requirements for these permit units.
- Condition 15 of the PTO is included as condition 25 of the requirements for these permit units.
- Condition 16 of the PTO is subsumed by conditions 9, 10, & 11 of the requirements for these permit units.
- Condition 17 of the PTO is subsumed by condition 19 of the requirements for these permit units.

b. 4 MW Allison Model 501 KB5 Natural Gas Fired Turbine (S-1547-459-12)

Permit unit S-1547-459 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 22 of the facility-wide requirements for this facility.
- Conditions 2 through 5 of the PTO are included as conditions 1 through 4 of the requirements for this permit unit.
- Condition 6 of the PTO is included as condition 8 of the requirements for this permit unit.
- Condition 7 of the PTO is included as condition 12 of the requirements for this permit unit.
- Condition 8 of the PTO is included as condition 13 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 11 of the requirements for this permit unit.
- Condition 10 of the PTO is included as condition 10 of the requirements for this permit unit.
- Condition 11 of the PTO is included as condition 7 of the requirements for this permit unit.
- Condition 12 of the PTO is included as condition 6 of the requirements for this permit unit.
- Condition 13 of the PTO is included as condition 9 of the requirements for this permit unit.
- Condition 14 of the PTO is included as condition 15 of the requirements for this permit unit.
- Condition 15 of the PTO is included as condition 18 of the requirements for this permit unit.

- Condition 16 of the PTO is included as condition 23 of the requirements for this permit unit.
  - Condition 17 of the PTO is not included in the requirements for this permit unit because this unit not equipped with CEMs.
- c. 3.2 MW Solar Centaur Model T4500 Gas Fired Turbine (S-1547-879-1, -880-1, and -881-1)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 3 of the requirements for these permit units.
- Conditions 2 and 3 of the PTO are included as conditions 1 and 2 of the requirements for these permit units.
- Conditions 4 through 8 of the PTO are included as conditions 4 through 8 of the requirements for these permit units.
- Condition 9 of the PTO is subsumed by condition 28 of the requirements for these permit units.
- Condition 10 of the PTO is included as condition 22 of the facility-wide requirements for this facility.
- Conditions 11 and 12 of the PTO are included as conditions 11 and 12 of the requirements for these permit units.
- Condition 13 of the PTO is included as condition 14 of the requirements for these permit units.
- Condition 14 of the PTO is included as condition 9 of the requirements for these permit units.
- Condition 15 of the PTO is included as condition 10 of the requirements for these permit units.
- Condition 16 of the PTO is included as condition 30 of the requirements for these permit units.
- Condition 17 of the PTO is included as condition 15 of the requirements for these permit units.
- Condition 18 of the PTO is included as conditions 32 and 33 of the requirements for these permit units.
- Condition 19 of the PTO is included as condition 13 of the requirements for these permit units.
- Condition 20 of the PTO is included as condition 12 of the requirements for these permit units.
- Condition 21, 22, & 23 of the PTO are included as conditions 26, 27, & 28 of the requirements for these permit units.
- Condition 24 of the PTO is included as condition 28 of the requirements for these permit units.
- Condition 25 of the PTO is included as condition 29 of the requirements for these permit units.
- Condition 26 of the PTO is included as condition 30 of the requirements for these permit units.



- Condition 27 of the PTO is subsumed by condition 9 of the facility-wide requirements for this facility.
- Condition 28 of the PTO is included as condition 34 of the requirements for these permit units.
- Condition 29 of the PTO is included as condition 31 of the requirements for these permit units.
- Condition 30 of the PTO is included as condition 31 of the requirements for these permit units.
- Condition 31 of the PTO is subsumed by condition 22 of the requirements for these permit units.
- Condition 32 of the PTO is included as condition 16 of the requirements for these permit units.

d. 3.5 MW Gas Fired Turbine (S-1547-1060-3, -1061-3, and -1062-3)

These permit units were subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 of the PTO are included as conditions 1 through 4 of the requirements for these permit units.
- Condition 5 of the PTO is included as condition 6 of the requirements for these permit units.
- Condition 6 of the PTO is included as condition 11 of the requirements for these permit units.
- Condition 7 of the PTO is included as condition 12 of the requirements for these permit units.
- Condition 8 of the PTO is included as condition 14 of the requirements for these permit units.
- Condition 9 of the PTO is included as condition 13 of the requirements for these permit units.
- Condition 10 of the PTO is included as condition 15 of the requirements for these permit units.
- Condition 11 of the PTO is included as condition 16 of the requirements for these permit units.
- Condition 12 of the PTO is included as condition 5 of the requirements for these permit units.
- Conditions 13 through 16 of the PTO are included as conditions 7 through 10 of the requirements for these permit units.
- Condition 17 of the PTO is included as condition 23 of the requirements for these permit units.
- Conditions 18 through 20 of the PTO are included as conditions 17 through 19 of the requirements for these permit units.
- Condition 21 of the PTO is not included in the requirements for these permit units because this condition is redundant of condition 17.
- Condition 22 of the PTO is not included in of the requirements for these permit units because this condition is now obsolete.

**E. IC Engines**

a. 890 HP Diesel Fired IC Engine (S-1547-907-1)

Permit unit S-1547-907 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 of the PTO is included as condition 40 of the facility-wide requirements for this facility.
- Conditions 2 through 4 of the PTO are included as conditions 13 through 15 of the requirements for this permit unit.
- Condition 5 of the PTO is subsumed condition 2 of the requirements for this permit unit.
- Conditions 6 & 7 of the PTO are included as conditions 20 & 21 of the requirements for this permit unit.
- Condition 8 of the PTO is subsumed by condition 3 of the requirements for this permit unit.
- Condition 9 of the PTO is included as condition 12 of the requirements for this permit unit.
- Condition 10 & 11 of the PTO are included as conditions 16 & 17 of the requirements for this permit unit.
- Condition 12 of the PTO is subsumed by conditions 4, 5, & 6 of the requirements for this permit unit.
- Conditions 13 & 14 of the PTO are included as conditions 18 & 19 of the requirements for this permit unit.

b. 200 HP Diesel Fired IC Engine (S-1547-1033-1)

Permit unit S-1547-1033 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 of the PTO are included as conditions 1 through 5 of the requirements for this permit unit.

**F. Miscellaneous Equipment**

a. Sulfurous Acid Generator (S-1547-1012-1)

Permit unit S-1547-1012 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 7 of the PTO are included as conditions 1 through 7 of the requirements for this permit unit.

b. TEOR Gas Sulfur Scrubbing System (S-1547-822-1)

Permit unit S-1547-824 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 16 of the PTO are included as conditions 1 through 16 of the requirements for this permit unit.

c. TEOR Gas Scrubbing System (S-1547-824-2)

Permit unit S-1547-824 was subject to the District NSR Rule at the time the applicant applied for an Authority to Construct. In accordance with the White Paper for streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8 of the PTO are included as conditions 1 through 8 of the requirements for this permit unit.
- Condition 9 of the PTO is subsumed by condition 9 of the facility-wide requirements for this facility.
- Condition 10 of the PTO is included as condition 9 of the requirements for this permit unit.

**G. Steam Generators and Heater Treaters.**

a. Steam Generators (S-1547-1, -3)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 16 through 32 of the requirements for these permit units.
- Condition 18 from the PTO is included as conditions 33 through 37 of the requirements for these permit units.
- Conditions 19 and 22 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.
- Conditions 20 and 21 from the PTO are included as condition 38, 39, and as template condition 11 of the requirements for these permit units.

b. Steam Generators (S-1547-7, -13)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the

resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 22 through 40 of the requirements for these permit units.

c. Steam Generator (S-1547-10)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 22 through 38 of the requirements for this permit unit.

d. Steam Generator (S-1547-16)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 22 through 42 of the requirements for this permit unit.

e. Steam Generator (S-1547-17)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 18 from the PTO are included as conditions 22 through 39 of the requirements for this permit unit.

f. Steam Generator (S-1547-22)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8 and 10 through 18 from the PTO are included as conditions 16 through 37 of the requirements for this permit unit.
- Condition 9 from the PTO is included as template conditions 8 through 11 of the requirements for this permit unit.

- Condition 19 from the PTO is included as template condition 3 of the requirements for this permit unit.

g. Steam Generator (S-1547-24)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 22 through 42 of the requirements for this permit unit.

h. Steam Generator (S-1547-40)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 22 through 41 of the requirements for this permit unit.

i. Steam Generators (S-1547-59, -60, -61)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 15 through 31 of the requirements for these permit units.
- Condition 18 from the PTO is included as conditions 32 through 36 of the requirements for these permit units.
- Conditions 19 and 22 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.
- Conditions 20 and 21 from the PTO are included as condition 37, 38, and as template condition 11 of the requirements for these permit units.

j. Steam Generator (S-1547-62, -65, -66)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for these permit units.

k. Steam Generator (S-1547-70)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 16 through 32 of the requirements for this permit unit.
- Condition 18 from the PTO is included as conditions 33 through 37 of the requirements for this permit unit.
- Conditions 19, 20 and 21 from the PTO are included as conditions 38 and 39 of the requirements for this permit unit.
- Condition 22 from the PTO is included as template condition 1 of the requirements for this permit unit.

l. Steam Generator (S-1547-74)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 21 through 40 of the requirements for this permit unit.

m. Steam Generator (S-1547-75)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 23 from the PTO are included as conditions 21 through 43 of the requirements for this permit unit.

n. Steam Generator (S-1547-76)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 24 from the PTO are included as conditions 21 through 44 of the requirements for this permit unit.

o. Steam Generator (S-1547-77)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 21 through 47 of the requirements for this permit unit.

p. Steam Generator (S-1547-78)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 23 through 49 of the requirements for this permit unit.
- Condition 28 from the PTO is not included as a requirement for this permit unit. The condition is obsolete since it is a startup condition.
- Condition 29 from the PTO is included as condition 50 of the requirements for this permit unit.

q. Steam Generator (S-1547-86)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 21 through 40 of the requirements for this permit unit.

r. Steam Generator (S-1547-87)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 15 through 31 of the requirements for this permit unit.
- Condition 18 from the PTO is included as conditions 32 through 36 of the requirements for this permit unit.
- Conditions 19, 20 and 21 from the PTO are included as conditions 37 and 38 of the requirements for this permit unit.

- Condition 22 from the PTO is included as template condition 1 of the requirements for this permit unit.

s. Steam Generator (S-1547-92, -126, -139)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 8 from the PTO are included as conditions 21 through 28 of the requirements for these permit units.
- Condition 9 from the PTO is subsumed by condition 6 of the requirements for these permit units.
- Conditions 10 through 18 from the PTO are included as conditions 29 through 37 of the requirements for these permit units.
- Condition 19 from the PTO is subsumed by condition 3 of the requirements for these permit units.

t. Steam Generator (S-1547-94, -95, -96, -127, -128)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for these permit units.

u. Steam Generator (S-1547-114)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 18 from the PTO are included as conditions 21 through 38 of the requirements for this permit unit.

v. Steam Generator (S-1547-116, -118)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 21 through 37 of the requirements for these permit units.



w. Steam Generator (S-1547-121, -122)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for these permit units.

x. Steam Generator (S-1547-123)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 21 through 47 of the requirements for this permit unit.

y. Steam Generator (S-1547-125)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 21 through 40 of the requirements for this permit unit.

z. Steam Generator (S-1547-130, -134)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for these permit units.

aa. Steam Generator (S-1547-141, -143)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 23 through 49 of the requirements for these permit units.

bb. Steam Generator (S-1547-142)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 26 from the PTO are included as conditions 23 through 48 of the requirements for this permit unit.

cc. Steam Generator (S-1547-144)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 25 from the PTO are included as conditions 23 through 47 of the requirements for this permit unit.

dd. Steam Generator (S-1547-145)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for this permit unit.

ee. Steam Generator (S-1547-146)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 21 through 47 of the requirements for this permit unit.

ff. Steam Generator (S-1547-152, -158)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined

Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for these permit units.

gg. Steam Generator (S-1547-157)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for this permit unit.

hh. Steam Generator (S-1547-159)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 21 through 37 of the requirements for this permit unit.

ii. Steam Generator (S-1547-164)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for this permit unit.

jj. Steam Generators (S-1547-168, -176)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 from the PTO are included as conditions 17 through 27 of the requirements for these permit units.
- Condition 12 from the PTO is included as conditions 28 through 32 of the requirements for these permit units.

- Condition 13 from the PTO is included as template condition 1 of the requirements for these permit units.
- Conditions 14, 15 and 16 from the PTO are included as conditions 33 and 34 of the requirements for these permit units.

kk. Steam Generator (S-1547-173, -174)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 22 through 41 of the requirements for these permit units.

ll. Steam Generator (S-1547-175)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 from the PTO are included as conditions 17 through 31 of the requirements for this permit unit.
- Condition 12 from the PTO is included as template condition 1 of the requirements for this permit unit.
- Conditions 13, 14, 15 and 16 from the PTO are included as conditions 32, 33 and 35 of the requirements for this permit unit.

mm. S Steam Generator (S-1547-189)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 22 through 38 of the requirements for this permit unit.

nn. Steam Generator (S-1547-190)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as condition 22 of the facility-wide requirements.

- Conditions 2 through 26 from the PTO are included as conditions 22 through 46 of the requirements for this permit unit.

oo. Steam Generator (S-1547-234, -238, -248)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 22 through 38 of the requirements for these permit units.

pp. Steam Generator (S-1547-241, -242, -243, -244)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 from the PTO are included as conditions 21 through 31 of the requirements for these permit units.
- Condition 12 from the PTO is subsumed by condition 7 of the requirements for these permit units.
- Conditions 13 through 21 from the PTO are included as conditions 32 through 40 of the requirements for these permit units.

qq. Steam Generator (S-1547-245)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 3 through 20 from the PTO are included as conditions 21 and 22 through 39 of the requirements for this permit unit.
- Condition 2 from the PTO is included as condition 22 of the facility-wide requirements.

rr. Steam Generator (S-1547-250)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 16 from the PTO are included as conditions 15 through 30 of the requirements for this permit unit.

- Condition 17 from the PTO is included as conditions 31 through 35 of the requirements for this permit unit.
- Conditions 18, 20 and 21 from the PTO are included as conditions 36 and 37 of the requirements for this permit unit.
- Conditions 19 and 22 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.

ss. Steam Generator (S-1547-251, -663)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as template condition 4 of the requirements for this permit unit.
- Condition 2 from the PTO is included as template condition 22 of the facility wide requirements (S-1547-0).
- Conditions 3 through 7 from the PTO are included as conditions 15 through 19 of the requirements for this permit unit.

tt. Heater Treater (S1547-252)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as template condition 4 of the requirements for this permit unit.
- Condition 2 from the PTO is included as condition 22 of the facility wide requirements.
- Conditions 3 through 8 from the PTO are included as conditions 15 through 20 of the requirements for this permit unit.

uu. Steam Generator (S-1547-355)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for this permit unit.

vv. Steam Generator (S-1547-361, -362, -363)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined

Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for these permit units.

ww. Steam Generator (S1547-569)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 5 from the PTO are included as conditions 15 through 19 of the requirements for this permit unit.
- Condition 6 from the PTO is included as conditions 20 through 24 of the requirements for this permit unit.
- Conditions 7 through 14 from the PTO are included as conditions 26 through 33 of the requirements for this permit unit.

xx. Steam Generator (S-1547-656)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 12 from the PTO are included as conditions 15 through 30 of the requirements for this permit unit.
- Condition 13 from the PTO is included as template condition 1 of the requirements for this permit unit.
- Conditions 14, 15 and 16 from the PTO are included as conditions 31 and 32 of the requirements for this permit unit.

yy. Steam Generator (S-1547-657)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 21 through 37 of the requirements for this permit unit.

zz. Heater Treater (S-1547-664)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined

Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 2 from the PTO is included as template condition 22 of the facility wide requirements (S-1547-0).
- Conditions 3 through 14 from the PTO are included as conditions 13 through 24 of the requirements for this permit unit.
- Condition 15 from the PTO is included as condition 3 of the requirements for this permit unit.

aaa. Heater Treater (S-1547-666)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as template condition 4 of the requirements for this permit unit.
- Condition 2 from the PTO is included as condition 22 of the facility wide requirements.
- Conditions 3 through 9 from the PTO are included as conditions 15 through 21 of the requirements for this permit unit.

bbb. Heater Treater (S-1547-667)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 from the PTO is included as condition 22 of the facility wide requirements.
- Conditions 3 through 6 from the PTO are included as conditions 2 through 5 of the requirements for this permit unit.

ccc. Heater Treater (S-1547-668)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.



- Condition 1 from the PTO is included as condition 4 of the requirements for this permit unit.
- Condition 2 from the PTO is included as template condition 22 of the facility wide requirements (S-1547-0).
- Conditions 3 through 9 from the PTO are included as conditions 13 through 19 of the requirements for this permit unit.

ddd. Heater Treaters (S-1547-669, -670)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as template condition 22 of the facility wide requirements (S-1547-0).
- Condition 2 from the PTO is included as condition 13 of the requirements for these permit units.

eee. Heater Treater (S-1547-673)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as condition 1 of the requirements for this permit unit.
- Condition 2 from the PTO is included as condition 22 of the facility wide requirements.
- Conditions 3 through 6 from the PTO are included as conditions 2 through 5 of the requirements for this permit unit.

fff. Steam Generator (S-1547-681)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 and 13 through 16 from the PTO are included as conditions 15 through 29 of the requirements for this permit unit.
- Condition 12 from the PTO is included as template condition 1 of the requirements for this permit unit.

ggg. Steam Generator (S-1547-682)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined

Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 21 through 37 of the requirements for this permit unit.

hhh. Steam Generator (S-1547-683, -684)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 21 through 37 of the requirements for these permit units.

iii. Steam Generator (S-1547-697)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 21 through 37 of the requirements for this permit unit.

jjj. Steam Generator (S-1547-709)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 22 through 41 of the requirements for this permit unit.

kkk. Steam Generator (S-1547-719)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 17 from the PTO are included as conditions 22 through 38 of the requirements for this permit unit.

III. Steam Generators (S-1547-722, -723, -725)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 and 6 through 16 from the PTO are included as conditions 16 through 30 of the requirements for these permit units.
- Condition 17 from the PTO is included as conditions 31 through 35 of the requirements for these permit units.
- Conditions 18 and 21 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.
- Conditions 19, 20 and 22 from the PTO are included as condition 36, 37, and 39 of the requirements for these permit units.

mmm. Steam Generator (S-1547-726, -735, -737, -738, -742, -743)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 25 from the PTO are included as conditions 22 through 46 of the requirements for these permit units.

nnn. Steam Generator (S-1547-727, -729)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 18 from the PTO are included as conditions 22 through 39 of the requirements for these permit units.

ooo. Steam Generator (S-1547-728)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO is included as condition 16 of the requirements for this permit unit. "SO<sub>4</sub> – 0.000 lb/MMBtu" requirement in this condition is less than 0.5 lb/day and is therefore considered insignificant and shall be removed.

- Condition 2 from the PTO is included as template condition 1 of the requirements for this permit unit.
- Conditions 3 through 7 from the PTO are included as conditions 17 through 29 of the requirements for this permit unit.
- Conditions 8 and 9 from the PTO are included as template condition 1 of the requirements for this permit unit.
- Condition 10 from the PTO is included as condition 30 of the requirements for this permit unit.
- Conditions 12 through 15 from the PTO are included as conditions 31 through 34 of the requirements for this permit unit.

ppp. Steam Generator (S-1547-733, -744, -745, -746, -747, -748, and -749)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 22 through 48 of the requirements for these permit units.

qqq. Steam Generator (S-1547-734)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 22 through 40 of the requirements for this permit unit.

rrr. Steam Generator (S-1547-751)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 12, 14, 15, and 16 from the PTO are included as conditions 16 through 30 of the requirements for this permit unit.
- Condition 13 from the PTO is included as template conditions 8, 10 and 11 of the requirements for this permit unit.
- Condition 17 from the PTO is included as conditions 31 through 35 of the requirements for this permit unit.
- Conditions 18 and 21 from the PTO are included as template conditions 1 and 3 of the requirements for this permit unit.
- Conditions 19, 20 and 22 from the PTO are included as condition 36, 37, and 39 of the requirements for this permit unit.

- sss. Steam Generators (S-1547-754, -755, -756, -757, -758, -759, -782, -783, -784, -785, -786, -802, -833)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 and 6 through 16 from the PTO are included as conditions 15 through 29 of the requirements for these permit units.
- Condition 5 from the PTO is included as template condition 7 of the requirements for these permit units.
- Condition 17 from the PTO is included as conditions 30 through 34 of the requirements for these permit units.
- Conditions 18 and 21 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.
- Conditions 19, 20 and 22 from the PTO are included as condition 35, 36, and 38 of the requirements for these permit units.

- ttt. Steam Generator (S-1547-760, -834, -835, -837)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 27 from the PTO are included as conditions 21 through 47 of the requirements for these permit units.

- uuu. Steam Generator (S-1547-761, -762, -803)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 25 from the PTO are included as conditions 21 through 45 of the requirements for these permit units.

- vvv. Steam Generator (S-1547-763, -764, -765)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 18 from the PTO are included as conditions 21 through 38 of the requirements for these permit units.

- www. Steam Generators (S-1547-766, -767, -768, -769, -770, -771, -772, -777, -778, -779, -780, -781, -797, -798, -799, -800, -804, -805, -806, -826)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 12, 14, 15, and 16 from the PTO are included as conditions 15 through 29 of the requirements for these permit units.
- Condition 13 from the PTO is included as template conditions 8, 10 and 11 of the requirements for these permit units.
- Condition 17 from the PTO is included as conditions 30 through 34 of the requirements for these permit units.
- Conditions 18 and 21 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.
- Conditions 19, 20 and 22 from the PTO are included as condition 35, 36, and 38 of the requirements for these permit units.

- xxx. Steam Generator (S-1547-787, -788, -789, -790, -791, -792)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 26 from the PTO are included as conditions 21 through 46 of the requirements for these permit units.

- yyy. Steam Generator (S-1547-793, -794)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 26 from the PTO are included as conditions 21 through 46 of the requirements for these permit units.

- zzz. Steam Generators (S-1547-795, -796)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 29 from the PTO are included as conditions 15 through 44 of the requirements for these permit units.
- Condition 23 from the PTO is also included as template condition 9 of the requirements for these permit units.

aaaa. Steam Generator (S-1547-801)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 22 from the PTO are included as conditions 15 through 40 of the requirements for this permit unit.
- Conditions 22 and 23 from the PTO are included as template conditions 9 and 1, respectively, of the requirements for this permit unit.
- Conditions 24 through 27 from the PTO are included as conditions 39, 41 and 42 of the requirements for this permit unit.

bbbb. Steam Generator (S-1547-807)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 25 from the PTO are included as conditions 21 through 45 of the requirements for this permit unit.

cccc. Steam Generators (S-1547-808, -809)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 3 and 5 through 16 from the PTO are included as conditions 15 through 28 of the requirements for these permit units.
- Condition 4 from the PTO is included as template condition 7 of the requirements for these permit units.
- Condition 17 from the PTO is included as conditions 29 through 33 of the requirements for these permit units.
- Conditions 18 and 21 from the PTO are included as template conditions 1 and 3 of the requirements for these permit units.
- Conditions 19, 20 and 22 from the PTO are included as condition 34, 35, and 37 of the requirements for these permit units.

dddd. Steam Generator (S-1547-810)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 21 from the PTO are included as conditions 21 through 41 of the requirements for this permit unit.

eeee. Steam Generator (S-1547-811, -812, -831)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for these permit units.

ffff. Steam Generator (S-1547-825)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 25 from the PTO are included as conditions 21 through 45 of the requirements for this permit unit.

gggg. Steam Generator (S-1547-827, -828, -829, -836)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 20 from the PTO are included as conditions 21 through 40 of the requirements for these permit units.

hhhh. Steam Generator (S-1547-830)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.



- Conditions 1 through 14, 16, 19, 20, and 21 from the PTO are included as conditions 15 through 33 of the requirements for this permit unit.
- Conditions 15, 17 and 18 from the PTO are included as template condition 1 of the requirements for this permit unit.
- Condition 22 from the PTO is included as condition 35 of the requirements for this permit unit.

iii. Steam Generator (S-1547-885, -886)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for these permit units.

jjjj. Heater Treaters (S-1547-900, -901)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 10 from the PTO are included as conditions 10 through 19 of the requirements for these permit units.
- Condition 11 from the PTO is included as condition 3 of the requirements for these permit units.

kkkk. Heater Treater (S-1547-908)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO are included as conditions 10 and 11 of the requirements for this permit unit.

llll. Heater Treaters (S-1547-988, -989, -990, -991, -992, -1005, -1006, -1007, -1008, -1009, -1010, -1011)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1, 2 and 3 from the PTO are included as conditions 10, 11 and 12 of the requirements for these permit units.

mmmm. Heater Treater (S-1547-994)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 4 from the PTO are included as conditions 20 through 23 of the requirements for this permit unit.

nnnn. Heater Treaters (S-1547-995, -998, -999, -1000, -1001)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 9 from the PTO are included as conditions 1 through 9 of the requirements for these permit units.
- Condition 10 from the PTO is included as condition 28 of the requirements for these permit units.

oooo. Heater Treater (S-1547-1002)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 11 from the PTO are included as conditions 10 through 20 of the requirements for this permit unit.
- Condition 12 from the PTO is included as condition 3 of the requirements for this permit unit.

pppp. Heater Treaters (S-1547-1003, -1004)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 9 from the PTO are included as conditions 10 through 18 of the requirements for these permit units.
- Condition 10 from the PTO is included as condition 3 of the requirements for these permit units.

qqqq. Steam Generator (S-1547-1030)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for this permit unit.

rrrr. Steam Generator (S-1547-1034, -1035)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 19 from the PTO are included as conditions 21 through 39 of the requirements for these permit units.

ssss. Heater Treater (S-1547-1084)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO are included as conditions 10 and 11 of the requirements for this permit unit.

**2. District Rule 1080, Stack Monitoring** (as amended December 17,1992) - (Non SIP replacement for Kern County Rule 108)

a. Turbine Units (S-1547-148-12, -149-12, -151-12, -879-1, -880-1, and -881-1)

District Rule 1080 has been submitted to the EPA to replace Kern County APCD Rule 108. The requirements of these rules are compared below, showing that the District Rule is at least as stringent as the County Rule.

**Comparison of District Rule 1080 to Kern County Rule 108**

REQUIREMENT	District Rule 1080	Kern County Rule 108
Continuous emissions monitors shall meet the applicable performance specifications of 40 CFR 51, App. P and 40 CFR 60, App. B, or equivalent as established by mutual agreement of the District, ARB, and EPA.	✓	✓
Breakdowns must be reported within 48 hours, unless the source can prove that a longer period was necessary.	✓ (8 hrs)	
The District must be notified within 24 hours prior to shutdown of monitoring equipment for maintenance.	✓	✓
Violations of any emissions standards of these rules, as shown by the stack monitoring equipment, must be reported within 48 hours.	✓	✓
Quarterly reports are required.	✓	✓
Records from the monitoring equipment shall be kept for at least two years.	✓	✓

Section 4.0 of this rule requires the installation, maintenance, operation and calibration of continuous emissions monitoring equipment as directed by the APCO. Condition 9 of the requirements for permit unit (S-5147-148-12, -149-12, & -151-12) and condition 17 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

Sections 6.5, 6.6, and 6.7 require that continuous monitors meet the performance specifications in 40 CFR Part 51 Appendix P, or Part 60 Appendix B, or equivalent specification. Condition 10 of the requirements for permit unit (S-5147-148-12, -149-12, & -151-12) and condition 18 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

Section 7.2 requires the reduction of continuous emissions data according to procedures outlined in 40 CFR 51 Appendix P. Condition 11 of the requirements for permit unit (S-5147-148-12, -149-12, & -151-12) and condition 19 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

Section 7.3 requires the records to be kept for the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, of CEMS installed pursuant to this rule. Condition 12 of the requirements for permit unit (S-5147-148-12, -149-12, & -151-12) and condition 20 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

Section 8.0 requires a quarterly report be submitted to the District on the 30<sup>th</sup> following the end of each calendar quarter. Condition 13 of the requirements for permit unit (S-5147-

148-12, -149-12, & -151-12) and condition 21 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

Section 9.0 requires the owner or operator to report to the APCO the occurrence of any violation of emissions standards within 96 hours. Condition 14 of the requirements for permit unit (S-5147-148-12, -149-12, & -151-12) and condition 22 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

Section 10 requires that the APCO be notified no later than eight hours after the detection of a breakdown of the CEMS. It also requires the operator to inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. Condition 15 of the requirements for permit unit (S-5147-148-12, -149-12, & -151-12) and condition 23 of the requirements for permit unit (S-5147-879-1, -880-1, & -881-1) assures compliance with this requirement.

**3. District Rule 1081, Source Sampling** (as amended December 16,1993) - (Non SIP replacement for Kern County Rule 108.1)

**a. Steam Generators & Heater Treaters, Gas Turbines**

District Rule 1081 has been submitted to the EPA to replace Kern County APCD Rule 108.1. The requirements of these rules are compared below, showing that the District Rule is at least as stringent as the County Rule:

**Comparison of District Rule 1081 to Kern County Rule 108.1**

REQUIREMENT	District Rule 1081	Kern County Rule 108.1
Upon request of the APCO, the source shall provide information and records to enable the APCO to determine when a representative sample can be taken.		✓
The facility shall collect, have collected or allow the APCO to collect, a source sample.	✓	✓
The source test shall be witnessed or authorized by District personnel.	✓	
The applicable test method, if not specified in the rule, shall be in accordance with 40 CFR 60, Appendix A.	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the nature to meet the applicable standard(s), an 3) arithmetic mean of two runs is acceptable if circumstances beyond the owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of District Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively. These requirements are covered by various conditions in the requirements for Steam Generators & Heater Treaters and Gas Turbines. While annual source testing to demonstrate compliance with all applicable rules and regulations is required for all Steam Generators & Heater Treaters and Gas Turbines. The following table lists conditions that have been added pursuant to this rule.

Permit Number	Rule 1081 Conditions
S-1547-1-20	1, 38, 39,
S-1547-3-20	1, 38, 39,
S-1547-7-20	1, 32, 37, 38, 39, 40,
S-1547-10-15	1, 30, 35, 36, 37,

Permit Number	Rule 1081 Conditions
S-1547-13-13	1, 32, 37, 38, 39,
S-1547-16-14	1, 39, 40, 41,
S-1547-17-21	1, 31, 36, 37, 38,
S-1547-22	1, 38, 39,
S-1547-24-15	1, 34, 39, 40, 41, 42,
S-1547-40-18	1, 33, 38, 39, 40, 41,
S-1547-59-13	1, 37, 38,
S-1547-60-12	1, 37, 38,
S-1547-61-13	1, 37, 38,
S-1547-62-14	1, 38, 39, 40,
S-1547-65-14	1, 38, 39, 40,
S-1547-66-13	1, 38, 39, 40,
S-1547-70-16	1, 38, 39,
S-1547-74-17	1, 37, 38, 39,
S-1547-75-13	1, 32, 37, 38, 39, 40,
S-1547-76-14	1, 32, 37, 38, 39, 40,
S-1547-77-12	1, 31, 32, 40, 45, 46, 47, 48,
S-1547-78-12	1, 32, 33, 41, 46, 47, 48, 49,
S-1547-86-17	1, 37, 38, 39,
S-1547-87-16	1, 37, 38,
S-1547-92-11	1, 35, 36, 37,
S-1547-94-10	1, 31, 36, 37, 38, 39,
S-1547-95-10	1, 31, 36, 37, 38, 39,
S-1547-96-12	1, 31, 36, 37, 38, 39,
S-1547-114-8	1, 30, 35, 36, 37,
S-1547-116-9	1, 29, 34, 35, 36,
S-1547-118-11	1, 29, 34, 35, 36,
S-1547-121-15	1, 33, 38, 39, 40, 41,
S-1547-122-15	1, 33, 38, 39, 40, 41,
S-1547-123-9	1, 31, 32, 40, 45, 46, 47, 48,
S-1547-125-11	1, 32, 37, 38, 39,
S-1547-126-10	1, 35, 36, 37,
S-1547-127-11	1, 31, 36, 37, 38, 39,
S-1547-128-10	1, 31, 36, 37, 38,
S-1547-130-9	1, 33, 38, 39, 40, 41,
S-1547-134-9	1, 33, 38, 39, 40, 41,
S-1547-139-8	1, 35, 36, 37,
S-1547-141-17	1, 46, 47, 48,
S-1547-142-17	1, 45, 46, 47,
S-1547-143-17	1, 46, 47, 48,
S-1547-144-17	1, 38, 43, 44, 45, 46,
S-1547-145-14	1, 31, 36, 37, 38, 39,
S-1547-146-9	1, 31, 32, 40, 45, 46, 47, 48,
S-1547-148-12	19, 20, 21,
S-1547-149-12	19, 20, 21,

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S-1547-151-12	19, 20, 21,
S-1547-152-9	1, 33, 38, 39, 40, 41,
S-1547-157-9	1, 33, 38, 39, 40, 41,
S-1547-158-9	1, 33, 38, 39, 40, 41,
S-1547-159-10	1, 30, 31, 32, 33,
S-1547-164-9	1, 31, 36, 37, 38,
S-1547-168-14	1, 33, 34,
S-1547-173-21	1, 38, 39, 40, 41,
S-1547-174-15	1, 38, 39, 40, 41,
S-1547-175-15	1, 32, 33,
S-1547-176-16	1, 33, 34,
S-1547-189-12	1, 35, 36, 37, 38,
S-1547-190-13	1, 37, 38, 39, 40, 41, 42,
S-1547-234-22	1, 35, 36, 37, 38,
S-1547-238-14	1, 35, 36, 37, 38,
S-1547-241-9	1, 30, 31, 32, 34,
S-1547-242-6	1, 30, 31, 32, 34,
S-1547-243-6	1, 30, 31, 32, 34,
S-1547-244-7	1, 30, 31, 32, 34,
S-1547-245-6	1, 29, 30, 31, 33,
S-1547-248-11	1, 35, 36, 37, 38,
S-1547-250-13	1, 36, 37,
S-1547-355-10	1, 33, 38, 39, 40, 41,
S-1547-361-10	1, 31, 36, 37, 38, 39,
S-1547-362-10	1, 31, 36, 37, 38, 39,
S-1547-363-10	1, 31, 36, 37, 38, 39,
S-1547-459-12	17, 18,
S-1547-569-3	1, 26, 27, 28, 29,
S-1547-656-8	1, 31, 32,
S-1547-657-8	1, 34, 35, 36, 37,
S-1547-681-2	1, 26, 27,
S-1547-682-2	1, 33, 34, 35, 36,
S-1547-683-1	1, 29, 34, 35, 36,
S-1547-684-1	1, 29, 34, 35, 36,
S-1547-697-12	1, 29, 34, 35, 36,
S-1547-709-1	1, 32, 37, 38, 39,
S-1547-719-1	1, 23, 27, 28, 29, 30, 31,
S-1547-722-1	1, 36, 37,
S-1547-723-1	1, 36, 37,
S-1547-725-1	1, 36, 37,
S-1547-726-1	1, 41, 42,
S-1547-727-1	1, 36, 37,
S-1547-728-1	1, 25, 26, 29,
S-1547-729-1	1, 36, 37,
S-1547-733-1	1, 43, 44, 45,

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S-1547-735-1	1, 41, 42,
S-1547-736-1	1, 41, 42,
S-1547-737-1	1, 41, 42,
S-1547-738-1	1, 41, 42,
S-1547-742-1	1, 41, 42,
S-1547-743-1	1, 41, 42,
S-1547-744-1	1, 43, 44, 45,
S-1547-745-1	1, 43, 44, 45,
S-1547-746-1	1, 43, 44, 45,
S-1547-747-1	1, 43, 44, 45,
S-1547-748-1	1, 43, 44, 45,
S-1547-749-1	1, 43, 44, 45,
S-1547-751-1	1, 36, 37,
S-1547-754-1	1, 35, 36,
S-1547-755-1	1, 35, 36,
S-1547-756-1	1, 35, 36,
S-1547-757-1	1, 35, 36,
S-1547-758-1	1, 35, 36,
S-1547-759-1	1, 35, 36,
S-1547-760-1	1, 42, 43, 44,
S-1547-761-1	1, 40, 41,
S-1547-762-1	1, 40, 41,
S-1547-763-1	1, 29, 34, 35, 36,
S-1547-764-1	1, 29, 34, 35, 36,
S-1547-765-1	1, 29, 34, 35, 36,
S-1547-766-1	1, 35, 36,
S-1547-767-1	1, 35, 36,
S-1547-768-1	1, 35, 36,
S-1547-769-1	1, 35, 36,
S-1547-770-1	1, 35, 36,
S-1547-771-1	1, 35, 36,
S-1547-772-1	1, 35, 36,
S-1547-777-1	1, 35, 36,
S-1547-778-1	1, 35, 36,
S-1547-779-1	1, 35, 36,
S-1547-780-1	1, 35, 36,
S-1547-781-1	1, 35, 36,
S-1547-782-1	1, 35, 36,
S-1547-783-1	1, 35, 36,
S-1547-784-1	1, 35, 36,
S-1547-785-1	1, 35, 36,
S-1547-786-1	1, 35, 36,
S-1547-787-1	1, 41, 42, 43,
S-1547-788-1	1, 41, 42, 43,



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S-1547-789-1	1, 41, 42, 43,
S-1547-790-1	1, 41, 42, 43,
S-1547-791-1	1, 41, 42, 43,
S-1547-792-1	1, 41, 42, 43,
S-1547-793-1	1, 40, 41,
S-1547-794-1	1, 40, 41,
S-1547-795-1	1, 40, 41,
S-1547-796-1	1, 40, 41,
S-1547-797-1	1, 35, 36,
S-1547-798-1	1, 35, 36,
S-1547-799-1	1, 35, 36,
S-1547-800-1	1, 35, 36,
S-1547-801-1	1, 39, 40,
S-1547-802-1	1, 35, 36,
S-1547-803-1	1, 40, 41,
S-1547-804-1	1, 35, 36,
S-1547-805-1	1, 35, 36,
S-1547-806-1	1, 35, 36,
S-1547-807-1	1, 41, 42, 43,
S-1547-808-1	1, 34, 35,
S-1547-809-1	18, 19, 20,
S-1547-810-1	1, 32, 37, 38, 39,
S-1547-811-1	1, 30, 35, 36, 37,
S-1547-812-1	1, 30, 35, 36, 37,
S-1547-825-1	1, 40, 41,
S-1547-826-1	1, 35, 36,
S-1547-827-1	1, 31, 36, 37, 38,
S-1547-828-1	1, 31, 36, 37, 38,
S-1547-829-1	1, 31, 36, 37, 38,
S-1547-830-1	1, 29, 33,
S-1547-831-1	1, 30, 35, 36, 37,
S-1547-832-1	1, 36, 37,
S-1547-833-1	1, 35, 36,
S-1547-834-1	1, 42, 43, 44,
S-1547-835-1	1, 42, 43, 44,
S-1547-836-1	1, 31, 36, 37, 38,
S-1547-837-1	1, 42, 43, 44,
S-1547-879-1	27, 28, 29,
S-1547-880-1	27, 28, 29,
S-1547-881-1	27, 28, 29,
S-1547-885-1	1, 30, 35, 36, 37,
S-1547-886-1	1, 30, 35, 36, 37,
S-1547-1030-1	1, 30, 35, 36, 37,
S-1547-1034-5	1, 30, 31, 32,
S-1547-1035-5	1, 30, 31, 32,

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S-1547-1060-3	11, 19, 20, 21,
S-1547-1061-3	11, 19, 20, 21,
S-1547-1062-3	11, 19, 20, 21,

**4. District Rule 2520, Federally Mandated Operating Permits, Section 9.4.2**

- a. See following table for permit unit listing.

Section 9.4.2 of rule requires that periodic monitoring and record keeping be performed if none is associated with a given emission limit to assure compliance. All permit units are added appropriate monitoring conditions that are needed to assure compliance with emissions limits or throughput limits.

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S-1547-1-20	2, 4, 6, 7, 8, 9, 10, 11, 34, 35, 36, 37, 40,
S-1547-3-20	2, 4, 6, 7, 8, 9, 10, 11, 34, 35, 36, 37, 40,
S-1547-7-20	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-10-15	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-13-13	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-16-14	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 34,
S-1547-17-21	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-22	31 through 37
S-1547-24-15	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-40-18	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-59-13	2, 4, 6, 7, 8, 9, 10, 33, 34, 35, 36, 39,
S-1547-60-12	2, 4, 6, 7, 8, 9, 10, 33, 34, 35, 36, 39,
S-1547-61-13	2, 4, 6, 7, 8, 9, 10, 33, 34, 35, 36, 39,
S-1547-62-14	2, 4, 6, 7, 8, 9, 10, 19, 20, 31, 32, 33,
S-1547-65-14	2, 4, 6, 7, 8, 9, 10, 19, 20, 31, 32, 33,
S-1547-66-13	2, 4, 6, 7, 8, 9, 10, 19, 20, 31, 32, 33,
S-1547-70-16	2, 4, 6, 7, 8, 9, 10, 11, 28, 34, 35, 36, 37, 40,
S-1547-74-17	2, 4, 6, 7, 8, 9, 10, 19, 20, 32,
S-1547-75-13	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-76-14	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-77-12	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22,
S-1547-78-12	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22,
S-1547-86-17	2, 4, 6, 7, 8, 9, 10, 19, 20, 32,
S-1547-87-16	2, 4, 6, 7, 8, 9, 10, 27, 33, 34, 35, 36, 39,
S-1547-92-11	2, 5, 6, 7, 8, 9, 10, 11, 19, 20, 30,
S-1547-94-10	2, 5, 6, 7, 8, 9, 10, 11, 19, 20,
S-1547-95-10	2, 5, 6, 7, 8, 9, 10, 11, 19, 20,
S-1547-96-12	2, 5, 6, 7, 8, 9, 10, 11, 19, 20,
S-1547-114-8	3, 6, 9,
S-1547-116-9	3, 6,
S-1547-118-11	3, 6,
S-1547-121-15	2, 4, 6, 7, 8, 9, 10, 19, 20,

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S-1547-122-15	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-123-9	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22,
S-1547-125-11	3, 6,
S-1547-126-10	2, 5, 6, 7, 8, 9, 10, 11, 19, 20, 30,
S-1547-127-11	2, 5, 6, 7, 8, 9, 10, 11, 19, 20,
S-1547-128-10	2, 5, 6, 7, 8, 9, 10, 11, 19, 20,
S-1547-130-9	3, 6,
S-1547-134-9	3, 6,
S-1547-139-8	2, 5, 6, 7, 8, 9, 10, 11, 19, 20, 30,
S-1547-141-17	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22, 29,
S-1547-142-17	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22, 29,
S-1547-143-17	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22, 29,
S-1547-144-17	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22,
S-1547-145-14	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-146-9	2, 4, 6, 7, 8, 9, 10, 19, 20, 21, 22,
S-1547-148-12	16, 17, 18, 24,
S-1547-149-12	16, 17, 18, 24,
S-1547-151-12	16, 17, 18, 24,
S-1547-152-9	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-157-9	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-158-9	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-159-10	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-164-9	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-168-14	2, 5, 6, 7, 8, 9, 10, 11, 12, 29, 30, 31, 32, 35,
S-1547-173-21	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-174-15	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-175-15	2, 5, 6, 7, 8, 9, 10, 11, 12, 28, 29, 30, 31, 34,
S-1547-176-16	2, 5, 6, 7, 8, 9, 10, 11, 12, 29, 30, 31, 32, 35,
S-1547-189-12	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-190-13	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-234-22	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-238-14	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-241-9	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-242-6	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-243-6	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-244-7	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-245-6	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-248-11	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-250-13	2, 4, 6, 7, 8, 9, 10, 26, 32, 33, 34, 35, 38,
S-1547-251-3	2, 5, 6, 7, 8, 9, 10, 11,
S-1547-252-2	2, 5, 6, 7, 8, 9, 10, 11, 19, 20,
S-1547-260-1	20, 21, 22, 23, 24, 25, 26,
S-1547-261-1	20, 21, 22, 23, 24, 25, 26,
S-1547-350-1	23, 24, 25, 26, 27, 28, 29,
S-1547-353-11	26,

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S-1547-355-10	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-359-8	31,
S-1547-361-10	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-362-10	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-363-10	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-377-4	14, 15, 16, 17, 18, 19, 20, 22, 23, 24,
S-1547-378-2	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-379-2	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-380-2	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-381-2	9,
S-1547-383-3	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-384-1	19,
S-1547-393-3	14,
S-1547-394-3	14,
S-1547-395-3	14,
S-1547-396-3	14,
S-1547-397-3	14,
S-1547-398-3	14,
S-1547-399-3	6, 14,
S-1547-400-3	14,
S-1547-401-3	14,
S-1547-402-3	14,
S-1547-405-3	19,
S-1547-406-3	19,
S-1547-407-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-408-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-410-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-411-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-413-1	3, 4, 5, 6, 7, 8, 9, 10,
S-1547-423-3	8, 9, 10, 11, 12, 13, 14,
S-1547-424-2	19,
S-1547-425-2	19,
S-1547-441-4	25,
S-1547-442-2	20, 24,
S-1547-443-3	25,
S-1547-459-12	14, 15, 22,
S-1547-460-4	23,
S-1547-461-2	23,
S-1547-462-2	11, 12, 13, 14, 15, 16, 17, 19, 20, 21,
S-1547-463-2	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-465-2	23,
S-1547-479-1	4,
S-1547-489-1	4,
S-1547-491-1	4,
S-1547-569-3	2, 5, 6, 7, 8, 9, 10, 11, 21, 22, 23, 24, 25,

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S-1547-584-6	24,
S-1547-585-2	24,
S-1547-586-2	22,
S-1547-587-2	22,
S-1547-604-1	4,
S-1547-605-1	4,
S-1547-606-1	4,
S-1547-607-1	4,
S-1547-638-5	19,
S-1547-643-7	35,
S-1547-644-2	21,
S-1547-645-2	21,
S-1547-647-2	21,
S-1547-648-2	21,
S-1547-649-2	21,
S-1547-652-2	21,
S-1547-653-2	21,
S-1547-654-3	21,
S-1547-656-8	2, 4, 6, 7, 8, 9, 10, 27, 28, 29, 30, 33,
S-1547-657-8	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-658-2	23,
S-1547-663-3	2, 5, 6, 7, 8, 9, 10, 11,
S-1547-664-4	2, 5, 6, 7, 8, 9, 10, 11, 12,
S-1547-666-2	2, 5, 6, 7, 8, 9, 10, 11, 21,
S-1547-667-2	7, 8, 10, 11, 12, 13, 14,
S-1547-668-2	2, 5, 6, 7, 8, 9, 10, 11, 12,
S-1547-669-1	2, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22,
S-1547-670-1	2, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22,
S-1547-673-4	7, 8, 10, 11, 12, 13, 14,
S-1547-681-2	2, 4, 6, 7, 8, 9, 10, 28,
S-1547-682-2	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-683-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-684-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-687-2	26,
S-1547-688-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-689-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-690-1	22,
S-1547-691-1	17,
S-1547-692-1	17,
S-1547-693-1	17,
S-1547-694-1	8, 9, 10, 11, 12, 13, 14, 16,
S-1547-697-12	3, 6,
S-1547-699-1	4, 5, 6, 7, 8,
S-1547-700-1	4, 5, 6, 7, 8,
S-1547-703-1	4, 5, 6, 7,

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S-1547-705-1	19,
S-1547-707-1	9, 20,
S-1547-708-3	18,
S-1547-709-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-714-1	38,
S-1547-719-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-722-1	2, 4, 6, 7, 8, 9, 10, 11, 21, 32, 33, 34, 35, 38,
S-1547-723-1	2, 4, 6, 7, 8, 9, 10, 11, 21, 32, 33, 34, 35, 38,
S-1547-725-1	2, 4, 6, 7, 8, 9, 10, 11, 21, 32, 33, 34, 35, 38,
S-1547-726-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-727-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-728-1	2, 4, 6, 7, 8, 9, 10, 11, 21, 22, 23, 24, 27,
S-1547-729-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-733-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-734-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-735-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-736-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-737-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-738-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-742-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-743-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21,
S-1547-744-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-745-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-746-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-747-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-748-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-749-1	2, 4, 6, 7, 8, 9, 10, 11, 20, 21, 30,
S-1547-751-1	2, 4, 6, 7, 8, 9, 10, 11, 32, 33, 34, 35, 38,
S-1547-754-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-755-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-756-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-757-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-758-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-759-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-760-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 29,
S-1547-761-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-762-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-763-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-764-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-765-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-766-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-767-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-768-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-769-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,

Permit Number	Rule 2520 Monitoring Conditions
S-1547-770-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-771-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-772-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-777-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-778-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-779-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-780-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-781-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-782-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-783-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-784-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-785-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-786-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-787-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-788-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-789-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-790-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-791-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-792-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-793-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 42,
S-1547-794-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 42,
S-1547-795-1	2, 4, 6, 7, 8, 9, 10, 31, 36, 37, 38, 39, 42, 45,
S-1547-796-1	2, 4, 6, 7, 8, 9, 10, 31, 36, 37, 38, 39, 42, 45,
S-1547-797-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-798-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-799-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-800-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-801-1	2, 4, 6, 7, 8, 9, 10, 29, 35, 36, 37, 38, 43,
S-1547-802-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-803-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-804-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-805-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-806-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,
S-1547-807-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 30,
S-1547-808-1	2, 4, 6, 7, 8, 9, 10, 19, 30, 31, 32, 33, 36,
S-1547-809-1	13, 14, 15, 16, 17,
S-1547-810-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-811-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-812-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-819-1	37,
S-1547-820-1	23,
S-1547-822-1	18,
S-1547-823-1	20, 24,
S-1547-825-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-826-1	2, 4, 6, 7, 8, 9, 10, 31, 32, 33, 34, 37,

Permit Number	Rule 2520 Monitoring Conditions
S-1547-827-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-828-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-829-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-830-1	2, 4, 6, 7, 8, 9, 10, 30, 34,
S-1547-831-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-832-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-833-1	2, 4, 6, 7, 8, 9, 10, 20, 31, 32, 33, 34, 37,
S-1547-834-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 29,
S-1547-835-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 29,
S-1547-836-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-837-1	2, 4, 6, 7, 8, 9, 10, 19, 20, 29,
S-1547-843-1	16, 17, 18, 19, 20, 21, 22, 24, 25, 26, 27,
S-1547-844-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-845-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-846-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-847-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-848-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-849-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-850-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-851-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-852-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-853-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-854-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-855-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-856-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-857-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-858-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-859-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-860-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-861-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-862-1	10, 11, 12, 13, 14, 15, 16, 17, 18,
S-1547-863-1	10, 11, 12, 13, 14, 15, 16, 17, 18,
S-1547-865-1	19, 20, 21, 22, 23, 24, 25, 27, 28, 29, 30,
S-1547-866-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-867-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-868-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-869-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-870-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-871-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-872-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-873-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-874-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-875-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-876-1	5, 7, 8, 9, 10, 11, 12, 13, 14,
S-1547-877-1	5, 7, 8, 9, 10, 11, 12, 13, 14,



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S-1547-879-1	24, 25, 26, 31, 33,
S-1547-880-1	24, 25, 26, 31, 33,
S-1547-881-1	24, 25, 26, 31, 33,
S-1547-882-1	5, 6, 7, 8, 9, 10, 11, 12,
S-1547-883-1	5, 6, 7, 8, 9, 10, 11, 12,
S-1547-884-1	12, 13, 14, 15, 16, 17, 18, 20, 21, 22, 23,
S-1547-885-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-886-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-888-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-889-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-890-1	8, 9, 10, 11, 12, 13, 14, 15, 16,
S-1547-891-1	8, 9, 10, 11, 12, 13, 14, 15, 16,
S-1547-892-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-893-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-894-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-895-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-896-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-897-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-898-1	6, 8, 9, 10, 11, 12, 13, 14,
S-1547-899-1	6, 8, 9, 10, 11, 12, 13, 14,
S-1547-900-1	2, 5, 6, 7, 8, 9, 20, 21, 22, 23, 24, 25, 26, 27,
S-1547-901-1	2, 5, 6, 7, 8, 9, 20, 21, 22, 23, 24, 25, 26, 27,
S-1547-902-1	6, 8, 9, 10, 11, 12, 13, 14,
S-1547-903-1	6, 8, 9, 10, 11, 12, 13, 14,
S-1547-904-1	6, 8, 9, 10, 11, 12, 13, 14,
S-1547-905-1	6, 8, 9, 10, 11, 12, 13, 14,
S-1547-906-1	7, 9, 10, 11, 12, 13, 14, 15,
S-1547-908-1	2, 5, 6, 7, 8, 9,
S-1547-911-1	4, 5, 6, 7, 8,
S-1547-912-1	10, 13, 31,
S-1547-913-1	7, 11, 12, 13,
S-1547-914-1	7, 11, 12, 13,
S-1547-915-1	7, 11, 12, 13,
S-1547-944-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-945-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-946-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-947-1	9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20,
S-1547-948-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-949-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-950-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-951-1	10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21,
S-1547-958-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-961-1	15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26,
S-1547-988-1	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-989-1	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,

Permit Number	Rule 2520 Monitoring Conditions
S-1547-990-1	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-991-1	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-992-1	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-994-1	2, 5, 6, 7, 8, 9, 10, 14, 24, 25, 26, 27, 28, 29, 30, 31,
S-1547-995-2	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27,
S-1547-998-2	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27,
S-1547-999-2	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27,
S-1547-1000-2	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27,
S-1547-1001-2	9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27,
S-1547-1002-1	2, 5, 6, 7, 8, 9, 21, 22, 23, 24, 25, 26, 27, 28,
S-1547-1003-1	2, 5, 6, 7, 8, 9, 19, 20, 21, 22, 23, 24, 25, 26,
S-1547-1004-1	2, 5, 6, 7, 8, 9, 19, 20, 21, 22, 23, 24, 25, 26,
S-1547-1005-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1006-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1007-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1008-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1009-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1010-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1011-2	2, 5, 6, 7, 8, 9, 13, 14, 15, 16, 17, 18, 19, 20,
S-1547-1012-1	8,
S-1547-1014-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-1015-1	11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22,
S-1547-1016-1	5, 7, 8, 9, 10, 11, 12, 13, 14,
S-1547-1017-1	5, 7, 8, 9, 10, 11, 12, 13, 14,
S-1547-1018-1	14, 15, 16, 17, 18, 19, 20, 22, 23, 24, 25,
S-1547-1019-1	5, 7, 8, 9, 10, 11, 12, 13,
S-1547-1021-1	21,
S-1547-1022-1	7, 11, 12, 13,
S-1547-1023-1	10, 12, 13, 14, 15, 16, 17, 18, 19,
S-1547-1024-1	1, 2, 3, 4,
S-1547-1025-1	5, 6, 7, 8, 9, 10, 11, 12,
S-1547-1026-1	1, 2, 3, 4,
S-1547-1027-1	1, 2, 3, 4,
S-1547-1028-1	1, 2, 3, 4,
S-1547-1030-1	2, 4, 6, 7, 8, 9, 10, 19, 20,
S-1547-1033-1	9, 10,
S-1547-1034-5	2, 4, 6, 7, 8, 13, 14, 19,
S-1547-1035-5	2, 4, 6, 7, 8, 13, 14, 19,
S-1547-1060-3	17, 18, 23, 24,
S-1547-1061-3	17, 18, 23, 24,
S-1547-1062-3	17, 18, 23, 24,
S-1547-1063-4	21,
S-1547-1068-2	5, 6, 7, 8,
S-1547-1069-2	5, 6, 7, 8,
S-1547-1070-2	5, 6, 7, 8,

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S-1547-1079-6	17,
S-1547-1084-1	2, 5, 6, 7, 8, 9,
S-1547-1092-2	16,
S-1547-1093-2	13,
S-1547-1107-1	6, 7, 8, 9, 10, 11, 12, 14,
S-1547-1108-1	6, 7, 8, 9, 10, 11, 12, 14,

## 5. **District Rule 4201, Particulate Matter Concentration**

### a. Natural Gas Fired Permit Units

EPA issued a relative stringency finding, dated August 20, 1996, stating that District Rule 4201 is more stringent than SIP approved Kern County Rule 404. Section 3.1 of District Rule 4201 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas. District experience shows that all natural gas fired equipment complies with this rule with wide margin and this facility does not have any equipment not firing on natural gas other than Diesel fired IC engines. Therefore all natural gas fired units are expected to comply with rule.

### b. Diesel Fired IC Engine Units

Section 3.1 requires emissions to be at or below 0.1 grain of particulate matter per dry standard cubic foot of exhaust gas. Results from source tests of diesel-fired internal combustion (IC) engines generally indicate emission rates from these units are less than the allowable limit of 0.1 grain/dscf. Of the tests available at the time of this writing, most were in the range of 0.042 to 0.061 grain/dscf, with a low of 0.020 grain/dscf, and a high of 0.092 grain/dscf.

Periodic monitoring will be required in the form of source testing, unless the engine is an emergency or backup IC engine operating less than 200 hours per year. These units are backup standby units and using CA diesel fuel with sulfur content less than 0.5% by weight. Compliance with the requirements of this rule is expected.

## 6. **District Rule 4401, Steam Enhanced Crude Oil Production Well Vents**

This rule has been SIP approved and applies to all of the steam-enhanced crude oil production well vents and their associated vapor collection and control systems as defined in Section 3 of this rule.

Section 5.0 sets forth requirements for limiting the emissions of Volatile Organic Compounds (VOCs). This section lists emission control requirements as well as work practice standards.

Section 6.0 sets forth requirements for testing and record keeping. This section also allows the APCO to waive certain control systems from the requirements of section 6.2.1. Section 6.2.1 requires annual source testing to show control efficiency compliance. This waiver applies to control systems consisting of fuel burning equipment, an internal combustion engine, smokeless flares, or systems that do not have a VOC destruction device (specifically, if VOC collected is re-injected underground).

The basis of the waiver for smokeless open flares is that technology does not currently exist for source testing these controls. However, typically these devices have 99% or greater control efficiency.

The basis of the waiver for control systems that reinject VOC underground is that these systems are assumed to have 100% control. This VOC disposal method does not use an emission destruction device and there is no need to conduct a source test.

The basis of the waiver for control systems consisting of fuel burning equipment (primarily steam generators) is that these units have greater than 99% control efficiency for VOC, as demonstrated by the following calculations:

STEAM GENERATORS:

$$\frac{5.5 \frac{\text{lb} \cdot \text{VOC}}{10^6 \cdot \text{cf}}}{\frac{1 \cdot \text{lb}}{23.8 \cdot \text{cf}}} = 0.00013 \frac{\text{lb} \cdot \text{VOC}}{\text{lb} \cdot \text{gas}} = 0.013 \%$$

where:

$$5.5 \frac{\text{lb} \cdot \text{VOC}}{10^6 \cdot \text{cf}} = \text{VOC emission factor from natural gas fired boilers (AP-42, Table 1.4-2)}$$

$$\frac{1 \cdot \text{lb}}{23.8 \text{cf}} = \text{density of natural gas, (AP-42, Appendix A)}$$

The preceding calculations demonstrate that the control efficiency for VOC emissions is greater than 99% by almost two orders of magnitude for steam generators. Therefore, source tests for VOC control effectiveness are clearly unnecessary.

Control systems that have been waived from the source test requirements of District Rule 6.2.1 are still required to demonstrate compliance with sections 5.1 and 5.2 of the rule for 99% control of collection and control efficiency. There are no general conditions from template addressing compliance with these sections for such equipment. Consequently, a one-time demonstration of collection efficiency using a mass balance and source specific data will be necessary for such sources.

Permit Number	Rule 4401 Conditions
S-1547-536-1	1, 2, 3, 4, 5, 6,
S-1547-838-2	3, 5, 6, 7, 8,
S-1547-1021-1	1, 5, 7, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21,
S-1547-1063-4	3, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22,
S-1547-1079-6	1, 3, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18,
S-1547-1092-2	1, 2, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17,
S-1547-1093-2	1, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,

## 7. **District Rule 4402, Crude Oil Production Sumps**

### a. Sand Basin (S-1547-907-1)

This rule applies to all first, second and third stage sumps at facilities producing, gathering, processing, separating, and/or storing crude oil in oil field. This permit unit is prohibited by condition 3 to function as a sump; therefore this rule does not apply.

## 8. **District Rule 4305, Boilers, Steam Generators, and Process Heaters**

The purpose of this rule is to limit emissions of oxides of nitrogen from boilers, steam generators, and Heater Treaters. This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or Heater Treater with rated heat input greater than 5 million Btu per hour.

Section 5 specifies performance requirements for boilers, steam generators, and Heater Treaters. It also allows alternative compliance methods.

Section 6 specifies administrative requirements, including record keeping, specific test methods, and requires applicable units to perform source tests.

Permit Number	4305 Conditions
S-1547-1-20	11, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 39, 40,
S-1547-3-20	11, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 39, 40,
S-1547-7-20	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 33, 34, 35, 38,
S-1547-10-15	11, 16, 17, 18, 19, 21, 23, 24, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 39, 40,
S-1547-11-14	2, 5,
S-1547-12-12	5, 6, 9, 10, 11, 12, 13, 14, 15, 18, 19, 20, 21, 22,
S-1547-13-13	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37,
S-1547-14-12	2, 5,
S-1547-16-14	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 35, 36, 37, 40,
S-1547-17-21	11, 16, 17, 18, 19, 21, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-19-20	2, 9,
S-1547-22-15	2, 5, 6, 7, 8, 9, 10, 11, 14, 15, 16, 17, 18,
S-1547-23-19	2, 10,
S-1547-24-15	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37,
S-1547-26-15	2, 10,
S-1547-32-10	2, 7,
S-1547-40-18	11, 16, 17, 18, 19, 21, 22, 25, 26, 27, 28, 29, 30, 31, 34, 35, 36, 37,
S-1547-47-15	2, 5,
S-1547-48-12	2, 7,
S-1547-55-13	2, 6,
S-1547-56-12	2, 6,
S-1547-57-13	2, 8,
S-1547-58-13	2, 8,
S-1547-59-13	10, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38, 39,
S-1547-60-12	10, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38, 39,

Permit Number	4305 Conditions
S-1547-61-13	10, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38, 39,
S-1547-62-14	10, 15, 16, 17, 18, 20, 22, 25, 26, 27, 28, 29, 30, 34, 35, 36, 39,
S-1547-65-14	10, 15, 16, 17, 18, 20, 22, 25, 26, 27, 28, 29, 30, 34, 35, 36, 39,
S-1547-66-13	10, 15, 16, 17, 18, 20, 22, 25, 26, 27, 28, 29, 30, 34, 35, 36, 39,
S-1547-67-19	2, 5,
S-1547-68-16	2, 5,
S-1547-70-16	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37,
S-1547-74-17	10, 15, 16, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 33, 34, 35, 36, 39,
S-1547-75-13	10, 15, 16, 17, 18, 20, 31, 32, 33, 34, 35, 36, 37, 38, 39, 42,
S-1547-76-14	10, 15, 16, 17, 18, 20, 31, 32, 33, 34, 35, 36, 37, 38, 39, 42,
S-1547-77-12	10, 15, 16, 17, 18, 20, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-78-12	10, 15, 16, 17, 18, 20, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-79-9	2, 6,
S-1547-80-9	2, 6,
S-1547-81-15	2, 9,
S-1547-85-9	2, 5,
S-1547-86-17	10, 15, 16, 17, 18, 20, 22, 24, 25, 26, 27, 28, 29, 33, 34, 35, 36, 39,
S-1547-87-16	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-92-11	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 31, 32, 33, 34, 37,
S-1547-93-10	2, 5,
S-1547-94-10	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-95-10	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-96-12	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-114-8	9, 15, 16, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-116-9	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-117-9	2, 5,
S-1547-118-11	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-119-13	2, 8,
S-1547-120-12	2, 6,
S-1547-121-15	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-122-15	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-123-9	10, 15, 16, 17, 18, 20, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-124-12	2, 15, 16,
S-1547-125-11	9, 15, 16, 17, 18, 20, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38,
S-1547-126-10	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 31, 32, 33, 34, 37,
S-1547-127-11	9, 15, 16, 17, 18, 20, 21, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 35,
S-1547-128-10	9, 15, 16, 17, 18, 20, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-129-8	2, 5,
S-1547-130-9	9, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-133-8	2, 5,
S-1547-134-9	9, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-135-9	2, 15, 16,
S-1547-137-12	2, 6,
S-1547-138-9	2, 6,
S-1547-139-8	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 31, 32, 33, 34, 37,

Permit Number	4305 Conditions
S-1547-140-8	2, 5,
S-1547-141-17	10, 15, 16, 17, 18, 20, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 48,
S-1547-142-17	10, 15, 16, 17, 18, 20, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 47,
S-1547-143-17	10, 15, 16, 17, 18, 20, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 48,
S-1547-144-17	10, 15, 16, 17, 18, 20, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-145-14	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-146-9	10, 15, 16, 17, 18, 20, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-147-9	2, 6,
S-1547-152-9	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-157-9	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-158-9	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-159-10	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 31, 32, 33, 36,
S-1547-164-9	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-168-14	9, 17, 18, 19, 20, 22, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-173-21	11, 16, 17, 18, 19, 21, 27, 28, 29, 30, 31, 32, 33, 36, 37, 38, 41,
S-1547-174-15	11, 16, 17, 18, 19, 21, 27, 28, 29, 30, 31, 32, 33, 36, 37, 38, 41,
S-1547-175-15	9, 17, 18, 19, 20, 22, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-176-16	9, 17, 18, 19, 20, 22, 30, 31, 32, 33, 34, 35, 36, 37, 38, 41,
S-1547-179-18	2, 5,
S-1547-187-10	2, 5,
S-1547-189-12	11, 16, 17, 18, 19, 21, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38,
S-1547-190-13	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 34, 35, 36, 39,
S-1547-234-22	11, 16, 17, 18, 19, 21, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-238-14	11, 16, 17, 18, 19, 21, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-241-9	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-242-6	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-243-6	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-244-7	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-245-6	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-248-11	11, 16, 17, 18, 19, 21, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 37,
S-1547-249-9	2, 5,
S-1547-250-13	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-251-3	9, 16, 17, 19,
S-1547-252-2	9, 16, 17, 19,
S-1547-254-5	2, 5,
S-1547-256-12	2, 5, 8, 9, 10, 11,
S-1547-257-12	2, 5, 8, 9, 10, 11,
S-1547-355-10	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-356-11	5, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20, 23,
S-1547-357-11	2, 5,
S-1547-361-10	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-362-10	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-363-10	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-567-3	2, 4, 5,
S-1547-569-3	9, 15, 16, 17, 18, 20, 23, 24, 25, 26, 29, 30, 31, 32,

Permit Number	4305 Conditions
S-1547-570-3	2, 5,
S-1547-574-3	2, 5,
S-1547-575-3	2, 5,
S-1547-576-3	2, 5,
S-1547-578-2	2, 5,
S-1547-581-3	2, 5,
S-1547-656-8	10, 15, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 31, 32, 33, 36,
S-1547-657-8	10, 15, 16, 17, 18, 20, 21, 22, 23, 24, 25, 26, 27, 28, 31, 32, 33, 36,
S-1547-663-3	9, 15, 16, 17, 18, 19,
S-1547-664-4	9, 19, 20, 21, 22, 23,
S-1547-666-2	9, 17, 18, 19, 20, 21,
S-1547-667-2	14,
S-1547-668-2	9,
S-1547-669-1	9,
S-1547-670-1	9,
S-1547-673-4	14,
S-1547-681-2	10, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 29,
S-1547-682-2	10, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 30,
S-1547-683-1	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-684-1	10, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-697-12	9, 15, 16, 17, 18, 20, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-698-13	2, 5,
S-1547-709-1	11, 16, 17, 18, 19, 21, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37,
S-1547-719-1	11, 16, 17, 18, 19, 21, 22, 24, 25, 26,
S-1547-722-1	11, 17, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37, 38,
S-1547-723-1	11, 17, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37, 38,
S-1547-725-1	11, 17, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37, 38,
S-1547-726-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-727-1	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 37,
S-1547-728-1	11, 16, 17, 18, 19, 21, 22, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-729-1	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 37,
S-1547-733-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-734-1	11, 16, 17, 18, 19, 21, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 37,
S-1547-735-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-736-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-737-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-738-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-742-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-743-1	11, 16, 17, 18, 19, 21, 23, 29, 30, 31, 32, 33, 34, 36, 37, 38, 40, 41,
S-1547-744-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-745-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-746-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-747-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-748-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,
S-1547-749-1	11, 16, 17, 18, 19, 21, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 45,



Permit Number	4305 Conditions
S-1547-751-1	11, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37, 38,
S-1547-754-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-755-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-756-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-757-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-758-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-759-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-760-1	10, 15, 16, 17, 18, 20, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 44,
S-1547-761-1	10, 15, 16, 17, 18, 20, 22, 28, 29, 30, 31, 32, 33, 35, 36, 37, 39, 40,
S-1547-762-1	10, 15, 16, 17, 18, 20, 22, 28, 29, 30, 31, 32, 33, 35, 36, 37, 39, 40,
S-1547-763-1	10, 15, 16, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-764-1	10, 15, 16, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-765-1	10, 15, 16, 17, 18, 20, 23, 24, 25, 26, 27, 28, 29, 30, 31, 34,
S-1547-766-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-767-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-768-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-769-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-770-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-771-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-772-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-777-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-778-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-779-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-780-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-781-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-782-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-783-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-784-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-785-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-786-1	10, 16, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-787-1	10, 15, 16, 17, 18, 20, 30, 31, 32, 33, 34, 35, 37, 38, 39, 40, 43,
S-1547-788-1	10, 15, 16, 17, 18, 20, 30, 31, 32, 33, 34, 35, 37, 38, 39, 40, 43,
S-1547-789-1	10, 15, 16, 17, 18, 20, 30, 31, 32, 33, 34, 35, 37, 38, 39, 40, 43,
S-1547-790-1	10, 15, 16, 17, 18, 20, 30, 31, 32, 33, 34, 35, 37, 38, 39, 40, 43,
S-1547-791-1	10, 15, 16, 17, 18, 20, 30, 31, 32, 33, 34, 35, 37, 38, 39, 40, 43,
S-1547-792-1	10, 15, 16, 17, 18, 20, 30, 31, 32, 33, 34, 35, 37, 38, 39, 40, 43,
S-1547-793-1	10, 15, 16, 17, 18, 20, 22, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40,
S-1547-794-1	10, 15, 16, 17, 18, 20, 22, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40,
S-1547-795-1	10, 15, 17, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35,
S-1547-796-1	10, 15, 17, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35,
S-1547-797-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-798-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-799-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-800-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-801-1	10, 15, 16, 17, 18, 20, 27, 28, 29, 30, 31, 32, 33, 34, 35, 38,

Permit Number	4305 Conditions
S-1547-802-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-803-1	10, 15, 16, 17, 18, 20, 22, 28, 29, 30, 31, 32, 33, 35, 36, 37, 39, 40,
S-1547-804-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-805-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-806-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-807-1	10, 15, 16, 17, 18, 20, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 43,
S-1547-808-1	10, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35, 36,
S-1547-809-1	3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18,
S-1547-810-1	10, 15, 16, 17, 18, 20, 26, 27, 28, 29, 30, 31, 32, 33, 34, 37,
S-1547-811-1	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-812-1	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-825-1	10, 15, 16, 17, 18, 20, 22, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40,
S-1547-826-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-827-1	10, 15, 16, 17, 18, 20, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-828-1	10, 15, 16, 17, 18, 20, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-829-1	10, 15, 16, 17, 18, 20, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36,
S-1547-830-1	10, 15, 16, 17, 18, 20, 22, 31, 32, 33, 34, 35, 36, 37, 38, 39, 42,
S-1547-831-1	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-832-1	10, 15, 16, 17, 18, 20, 22, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36,
S-1547-833-1	10, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 36, 37,
S-1547-834-1	10, 15, 16, 17, 18, 20, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 44,
S-1547-835-1	10, 15, 16, 17, 18, 20, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 44,
S-1547-836-1	10, 15, 16, 17, 18, 20, 22, 23, 29, 30, 31, 32, 33, 34, 35, 36, 37, 40, 41,
S-1547-837-1	10, 15, 16, 17, 18, 20, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 44,
S-1547-885-1	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-886-1	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-994-1	9, 11,
S-1547-995-2	5, 6, 7, 9, 27,
S-1547-998-2	5, 6, 7, 9, 27,
S-1547-999-2	5, 6, 7, 9, 27,
S-1547-1000-2	5, 6, 7, 9, 27,
S-1547-1001-2	5, 6, 7, 9, 27,
S-1547-1030-1	10, 15, 16, 17, 18, 20, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35,
S-1547-1034-5	9, 10, 11, 12, 14, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 32,
S-1547-1035-5	9, 10, 11, 12, 14, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 32,
S-1547-1036-3	2,
S-1547-1037-4	2, 11,
S-1547-1058-3	5, 7, 8, 9, 10, 15,
S-1547-1059-3	5, 6,
S-1547-1074-4	2, 5, 16, 17, 18,
S-1547-1075-4	2, 5, 16, 17, 18,
S-1547-1086-5	2, 5, 16, 17, 18, 21, 23, 24,
S-1547-1088-4	2, 4, 5,
S-1547-1089-4	2, 4, 5,
S-1547-1090-4	2, 4, 5,

Permit Number	4305 Conditions
S-1547-1098-2	5, 6,

**9. District Rule 4623, Storage of Organic Liquids**

This rule applies to equipment used to store organic liquids with a true vapor pressure of greater than 0.5 psia and design capacity greater than 1100 gallons, pursuant to section 2.0, Applicability. Facility's uncontrolled tanks has been added a condition requiring TVP of stored liquids not to exceed 0.5 psia and periodic testing of TVP. Tanks with vapor recovery system is are required to have 95% or greater VOC control efficiency. Following table lists conditions with rule requirements.

Permit Number	Rule 4623 Conditions
S-1547-214-4	1, 7, 8,
S-1547-223-2	6, 8, 9, 10, 11, 12, 13, 14, 17, 18, 19, 20, 22, 23, 24, 40, 41, 42, 43,
S-1547-260-1	1, 3, 4, 5, 6, 7, 8, 9, 12, 13, 14, 15, 17, 18, 19, 35, 36, 37, 38,
S-1547-261-1	1, 3, 4, 5, 6, 7, 8, 9, 12, 13, 14, 15, 17, 18, 19, 35, 36, 37, 38,
S-1547-350-1	4, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 18, 20, 21, 22, 38, 39, 40, 41,
S-1547-353-11	6, 12, 13, 14, 22,
S-1547-377-4	13, 21,
S-1547-378-2	10, 18,
S-1547-379-2	10, 18,
S-1547-380-2	10, 18,
S-1547-381-2	10, 11,
S-1547-383-3	10, 18,
S-1547-384-1	5, 6, 7, 8, 16, 18,
S-1547-387-3	6, 12, 13, 14, 22,
S-1547-390-3	1, 3, 4, 5, 13,
S-1547-391-3	1, 3, 4, 5, 13,
S-1547-393-3	1, 2, 3, 4, 12,
S-1547-394-3	1, 2, 3, 4, 12,
S-1547-395-3	1, 2, 3, 4, 12,
S-1547-396-3	1, 2, 3, 4, 12,
S-1547-397-3	1, 2, 3, 4, 12,
S-1547-398-3	1, 2, 3, 4, 12,
S-1547-399-3	1, 2, 3, 4, 12,
S-1547-400-3	1, 2, 3, 4, 12,
S-1547-401-3	1, 2, 3, 4, 12,
S-1547-402-3	1, 2, 3, 4, 12,
S-1547-403-3	3, 5, 6, 7, 15,
S-1547-404-3	3, 5, 6, 7, 15,
S-1547-405-3	3, 5, 6, 7, 15,
S-1547-406-3	3, 5, 6, 7, 15,
S-1547-407-1	10, 18,
S-1547-408-1	10, 18,
S-1547-410-1	10, 18,
S-1547-411-1	10, 18,

Permit Number	Rule 4623 Conditions
S-1547-416-2	3, 5, 6, 7, 15,
S-1547-424-2	3, 5, 6, 7, 15,
S-1547-425-2	3, 5, 6, 7, 15,
S-1547-442-2	9, 10, 11, 19,
S-1547-443-3	10, 11, 12, 20,
S-1547-460-4	7, 9, 10, 11, 19,
S-1547-461-2	2, 10, 18,
S-1547-462-2	2, 10, 18,
S-1547-463-2	2, 10, 18,
S-1547-465-2	2, 10, 18,
S-1547-479-1	1, 2, 3, 4
S-1547-489-1	1, 2, 3, 4
S-1547-491-1	1, 2, 3, 4
S-1547-500-1	1, 2, 3, 4
S-1547-584-6	9, 10, 11, 19,
S-1547-585-2	9, 10, 11, 19,
S-1547-586-2	7, 8, 9, 17,
S-1547-587-2	7, 8, 9, 17,
S-1547-604-1	1, 2, 3, 4
S-1547-605-1	1, 2, 3, 4
S-1547-606-1	1, 2, 3, 4
S-1547-607-1	1, 2, 3, 4
S-1547-623-1	1, 2, 3, 4
S-1547-627-1	1, 2, 3, 4
S-1547-628-1	1, 2, 3, 4
S-1547-629-1	1, 2, 3, 4
S-1547-630-1	1, 2, 3, 4
S-1547-639-4	6, 8, 9, 10, 11, 12, 13, 14, 17, 18, 19, 20, 22, 23, 24, 40, 41, 42, 43,
S-1547-643-7	20, 21, 22, 30,
S-1547-644-2	6, 7, 8, 16,
S-1547-645-2	6, 7, 8, 16,
S-1547-647-2	6, 7, 8, 16,
S-1547-648-2	6, 7, 8, 16,
S-1547-649-2	6, 7, 8, 16,
S-1547-652-2	6, 7, 8, 16,
S-1547-653-2	6, 7, 8, 16,
S-1547-654-3	6, 7, 8, 16,
S-1547-658-2	9, 10, 11, 19,
S-1547-687-2	11, 12, 13, 21,
S-1547-688-1	7, 8, 9, 17,
S-1547-689-1	7, 8, 9, 17,
S-1547-690-1	7, 8, 9, 17,
S-1547-691-1	5, 6, 7, 15,
S-1547-692-1	5, 6, 7, 15,
S-1547-693-1	5, 6, 7, 15,

Permit Number	Rule 4623 Conditions
S-1547-694-1	5, 6, 7, 15,
S-1547-705-1	5, 6, 7, 15,
S-1547-843-1	10, 13, 14, 15, 23,
S-1547-844-1	4, 6, 7, 8, 16,
S-1547-845-1	4, 6, 7, 8, 16,
S-1547-846-1	4, 6, 7, 8, 16,
S-1547-847-1	4, 6, 7, 8, 16,
S-1547-848-1	4, 6, 7, 8, 16,
S-1547-849-1	4, 6, 7, 8, 16,
S-1547-850-1	4, 6, 7, 8, 16,
S-1547-851-1	4, 6, 7, 8, 16,
S-1547-852-1	4, 6, 7, 8, 16,
S-1547-853-1	4, 6, 7, 8, 16,
S-1547-854-1	8, 12, 13, 14, 22,
S-1547-855-1	4, 8, 9, 10, 18,
S-1547-856-1	4, 8, 9, 10, 18,
S-1547-857-1	4, 8, 9, 10, 18,
S-1547-858-1	4, 8, 9, 10, 18,
S-1547-859-1	4, 8, 9, 10, 18,
S-1547-860-1	4, 8, 9, 10, 18,
S-1547-861-1	4, 8, 9, 10, 18,
S-1547-865-1	16, 17, 18, 26,
S-1547-866-1	12, 13, 14, 22,
S-1547-867-1	12, 13, 14, 22,
S-1547-868-1	12, 13, 14, 22,
S-1547-869-1	12, 13, 14, 22,
S-1547-870-1	12, 13, 14, 22,
S-1547-871-1	12, 13, 14, 22,
S-1547-872-1	12, 13, 14, 22,
S-1547-873-1	12, 13, 14, 22,
S-1547-874-1	12, 13, 14, 22,
S-1547-875-1	12, 13, 14, 22,
S-1547-884-1	3, 9, 10, 11, 19,
S-1547-888-1	8, 9, 10, 18,
S-1547-889-1	8, 9, 10, 18,
S-1547-917-1	1, 2, 3, 4,
S-1547-918-1	1, 2, 3, 4,
S-1547-919-1	1, 2, 3, 4,
S-1547-920-1	1, 2, 3, 4,
S-1547-921-1	1, 2, 3, 4,
S-1547-924-1	1, 2, 3, 4,
S-1547-944-1	8, 9, 10, 18,
S-1547-945-1	7, 8, 9, 17,
S-1547-946-1	6, 7, 8, 16,
S-1547-947-1	6, 7, 8, 16,

Permit Number	Rule 4623 Conditions
S-1547-948-1	7, 8, 9, 17,
S-1547-949-1	7, 8, 9, 17,
S-1547-950-1	7, 8, 9, 17,
S-1547-951-1	7, 8, 9, 17,
S-1547-958-1	12, 13, 14, 22,
S-1547-961-1	12, 13, 14, 22,
S-1547-963-1	1, 2, 3, 4,
S-1547-964-1	1, 2, 3, 4,
S-1547-970-1	1, 2, 3, 4,
S-1547-972-1	1, 2, 3, 4,
S-1547-973-1	1, 2, 3, 4,
S-1547-974-1	1, 2, 3, 4,
S-1547-977-1	1, 2, 3, 4,
S-1547-979-1	1, 2, 3, 4,
S-1547-986-1	1, 2, 3, 4,
S-1547-987-1	1, 2, 3, 4,
S-1547-1014-1	8, 9, 10, 18,
S-1547-1015-1	8, 9, 10, 18,
S-1547-1018-1	11, 12, 13, 21,
S-1547-1029-2	4, 5, 6, 7,
S-1547-1038-1	1, 2, 3, 4,
S-1547-1039-1	1, 2, 3, 4,
S-1547-1040-1	1, 2, 3, 4,
S-1547-1041-1	1, 2, 3, 4,
S-1547-1042-1	1, 2, 3, 4,
S-1547-1043-1	1, 2, 3, 4,
S-1547-1044-1	1, 2, 3, 4,
S-1547-1045-1	1, 2, 3, 4,
S-1547-1064-2	3, 4, 5, 6,
S-1547-1065-1	1, 2, 3, 4,
S-1547-1066-1	1, 2, 3, 4,
S-1547-1067-1	1, 2, 3, 4,
S-1547-1071-1	1, 2, 3, 4,
S-1547-1072-1	1, 2, 3, 4,
S-1547-1073-1	1, 2, 3, 4,
S-1547-1076-1	14, 15, 16, 24,
S-1547-1077-1	8, 9, 10, 18,
S-1547-1081-1	8, 9, 10, 18,
S-1547-1087-1	1, 2, 3, 4,
S-1547-1107-1	3, 4, 5, 13,
S-1547-1108-1	3, 4, 5, 13,

# 10. District Rule 4801, Sulfur Compounds

District Rule 4801 has been submitted to the EPA to replace Kern County Rule 407, which is in the SIP. District Rule 4801 is as stringent as Kern County Rule 407, as shown below.

Comparison of District Rule 4801 and Kern County Rule 407

REQUIREMENTS	4801 District	407 Kern
A person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

## a. Diesel Fired IC Engine Units

This rule contains a limit on sulfur compounds. The limit at the point of discharge is 0.2 percent by volume, 2000 ppmv, calculated as sulfur dioxide (SO<sub>2</sub>), on a dry basis averaged over 15 consecutive minutes. The maximum fuel sulfur content that can be combusted in a diesel-fired IC engines to comply with the sulfur emission rate of 2000 ppmv is calculated as follows:

Maximum Fuel Sulfur Content of Diesel to Assure Compliance with Rule 4801

$$\frac{\left(137,000 \frac{\text{Btu}}{\text{gal}}\right) \left(\frac{9190 \text{ dscf}}{10^6 \text{ Btu}}\right) \left(32.06 \frac{\text{g S}}{\text{mol}}\right) \left(0.002 \frac{\text{mol S}}{\text{mol exhaust}}\right) \left(28.317 \frac{\text{L}}{\text{cf}}\right)}{\left(23.6 \frac{\text{L}}{\text{mol}}\right) \left(7.05 \frac{\text{lb}}{\text{gal}}\right) \left(453.59 \frac{\text{g}}{\text{lb}}\right)} = 0.030 \frac{\text{lb S}}{\text{lb Diesel}} \text{ where,}$$

$$\left(\frac{9190 \text{ dscf}}{10^6 \text{ Btu}}\right) = \text{F-Factor for Diesel (40 CFR 60 Appendix A Table 19-1)}$$

137,000 = Heat content of diesel (AP-42, Appendix A)

7.05 = density of diesel (AP-42, Appendix A)

23.6 = Volume 1 mole of gas occupies at standard condition (1 atm, 15.5 °C)

32 = Molecular weight of sulfur

Diesel fuel with a sulfur content of less than 3.0% by weight will satisfy the conditions of District Rule 4801. An IC engine that is fired on Air Resources Board quality diesel fuel with maximum sulfur content 0.05% by weight will be in compliance with this rule requirements. Testing and record keeping requirements assure this limit will be required when the unit is not fired on ARB certified diesel fuel.

# 11. 40 CFR 60 Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids

All the storage vessels for petroleum liquids located at AERA Energy LLC's Western Heavy Oil Field are not subject to the requirement of these Subparts. Per Affected facility definition, it does not include "storage vessel for petroleum liquids or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer".

Thus, all the units stored petroleum liquids and have the capacity not greater than 420,000 gallons (or 1,589.874 m<sup>3</sup>) at this facility, S-1135, are exempted from the requirements of 40 CFR 60 Subpart Ka, since the storage tanks are used to store crude oil and petroleum liquids in production oil fields and have no custody of transferring.

Some petroleum storage tanks have capacity equal to 420,000 gallons and shall be subject to the requirement of Subpart Ka. Since these tanks are equipped with vapor recovery system capable of reducing at least 95% VOC complying with the requirement of 40 CFR section 112a(a)3. Subpart Ka does not require any monitoring or record keeping if unit is equipped with Vapor recovery system.

**12. 40 CFR 60 Subpart GG, Standards of Performance of Stationary Gas Turbines**

All the gas turbines engines at this facility are subject to the requirements of 40 CFR Subpart GG. Conditions have been added to these permit units to assure compliance with NSPS requirements.

Permit Number	Subpart GG Conditions
S-1547-148-12	5, 17, 18, 19,
S-1547-149-12	5, 17, 18, 19,
S-1547-151-12	5, 17, 18, 19,
S-1547-459-12	4, 5, 8, 9, 14, 15, 16, 19, 21,
S-1547-879-1	11, 12, 25, 26, 27,
S-1547-880-1	11, 12, 25, 26, 27,
S-1547-881-1	11, 12, 25, 26, 27,
S-1547-1060-3	3, 6, 16, 17, 18, 19, 22, 25,
S-1547-1061-3	3, 6, 16, 17, 18, 19, 22, 25,
S-1547-1062-3	3, 6, 16, 17, 18, 19, 22, 25,

**13. 40 CFR Part 52.21 Prevention of Significant Deterioration (PSD)**

This facility has a number of PSD permits, which have been issued at various times. Many of these PSD permits were issued to Mobile Oil Corporation prior to June 1997 when Mobile and Shell (Cal Resources) combined their California operations into Aera Energy LLC. In 1990 Mobile applied to rescind or modify these permits due to changes in operations. In many cases the equipment has been removed and in other cases the equipment has been modified to only burn natural gas (instead of a combination of produced oil and natural gas). See attachment D for PSD permits.

**a. Permit SJ 78-11**

USEPA PSD permit SJ 78-11 was issued/amended by Region IX on December 22, 1981. Conditions from this permit were addressed to define how permit terms should be incorporated into the Title V permit. The following permit units are affected by this PSD permit: 709, 725, 733, 742, 743, 744, 745, 746, 747, 748, 749 and 760.

- Notice Of Startup

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Facilities Operation



This condition has been included as condition 40 of the requirements for permit units 709, 725.

This condition has been included as condition 49 of the requirements for permit units 733, 744, 745, 746, 747, 748, 749.

This condition has been included as condition 47 of the requirements for permit units 742, 743.

This condition has been included as condition 48 of the requirements for permit unit 760.

- Malfunction

This condition has been included as conditions 41 and 42 of the requirements for permit units 709, 725.

This condition has been included as conditions 50 and 51 of the requirements for permit units 733, 744, 745, 746, 747, 748, 749.

This condition has been included as conditions 48 and 49 of the requirements for permit units 742, 743.

This condition has been included as conditions 49 and 50 of the requirements for permit unit 760.

- Right to Entry

This condition has been subsumed by permit template conditions 18 through 21 of the facility wide permit.

- Transfer of Ownership

This condition appears to be a pre-construction requirement, and has been satisfied, and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Severability

This condition has been subsumed by permit template condition 12 of the facility wide permit.

- Other Applicable Regulations

This condition has been included as condition 43 of the requirements for permit units 709, 725.

This condition has been included as condition 52 of the requirements for permit units 733, 744, 745, 746, 747, 748, 749.

This condition has been included as condition 50 of the requirements for permit units 742, 743.

This condition has been included as condition 51 of the requirements for permit unit 760.

- Special Conditions

Special conditions, which identify or limit the use of fuel oil, have been removed. These units are permitted for the combustion of gaseous fuels only. Also, unit-specific requirements for production wells were not included on boiler permits.

Start-up conditions have been satisfied and are therefore obsolete. Start-up conditions have not been included in the requirements for these permit units.

Other special conditions have been included as conditions 23 and 44 through 47 of the requirements for permit unit 709.

Other special conditions have been included as conditions 17 and 44 through 47 of the requirements for permit unit 725.

Other special conditions have been included as conditions 27 and 51 through 56 of the requirements for permit units 742, 743.

Other special conditions have been included as conditions 26 and 53 through 58 of the requirements for permit units 744, 745, 746, 747, 748, 749.

- Agency Notifications

This condition has been included as condition 48 of the requirements for permit units 709, 725.

This condition has been included as condition 53 of the requirements for permit unit 733.

This condition has been included as condition 57 of the requirements for permit units 742, 743.

This condition has been included as condition 59 of the requirements for permit units 744, 745, 746, 747, 748, 749.

This condition has been included as condition 52 of the requirements for permit unit 760.

b. Permit SJ 89-01

USEPA PSD permit SJ 89-01 was issued/amended by Region IX on March 6, 1991. Conditions from this permit were addressed to define how permit terms should be incorporated into the Title V permit. The following permit units are affected by this PSD permit: 780, 781, 811, 812, 831, 885, 886 and 1030.

- Permit Expiration

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Notice Of Startup

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Facilities Operation

This condition has been included as condition 39 of the requirements for permit units 780, 781.

This condition has been included as condition 38 of the requirements for permit units 811, 812, 831, 885, 886 1030.

- Malfunction

This condition has been included as conditions 40 and 41 of the requirements for permit units 780, 781.

This condition has been included as conditions 39 and 40 of the requirements for permit units 811, 812, 831, 885, 886, 1030.

- Right to Entry

This condition has been subsumed by permit template conditions 18 through 21 of the facility wide permit.

- Transfer of Ownership

This condition appears to be a pre-construction requirement, and has been satisfied, and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Severability

This condition has been subsumed by permit template condition 12 of the facility wide permit.

- Other Applicable Regulations

This condition has been included as condition 42 of the requirements for permit units 780, 781.

This condition has been included as condition 41 of the requirements for permit units 811, 812, 831, 885, 886, 1030.

- Special Conditions

Special conditions, which identify or limit the use of fuel oil, have been removed. These units are permitted for the combustion of gaseous fuels only. Also, unit-specific requirements for cogenerations were not included on boiler permits.

Start-up conditions have been satisfied and are therefore obsolete. Start-up conditions have not been included in the requirements for these permit units.

Other special conditions have been included as conditions 16, and 43 through 55 of the requirements for permit units 780, 781.

Other special conditions have been included as conditions 42 through 55 of the requirements for permit units 811, 812, 831, 885, 886.

Other special conditions have been included as conditions 22, and 42 through 54 of the requirements for permit unit 1030.

- Agency Notifications

This condition has been included as condition 56 of the requirements for permit units 780, 781, 811, 812, 831, 885, 886.

This condition has been included as condition 55 of the requirements for permit unit 1030.

c. Permit SJ 89-02

USEPA PSD permit SJ 89-02 was issued/amended by Region IX on March 6, 1991. Conditions from this permit were addressed to define how permit terms should be incorporated into the Title V permit. The following permit units are affected by this PSD permit: 801, 805, 806, 827, 828 and 829.

- Permit Expiration

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Notice Of Startup

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Facilities Operation

This condition has been included as condition 41 of the requirements for permit unit 801.

This condition has been included as condition 39 of the requirements for permit units 805, 806, 827, 828, 829.

- Malfunction

This condition has been included as conditions 42 and 43 of the requirements for permit unit 801.

This condition has been included as conditions 40 and 41 of the requirements for permit units 805, 806, 827, 828, 829.

- Right to Entry

This condition has been subsumed by permit template conditions 18 through 21 of the facility wide permit.

- Transfer of Ownership

This condition appears to be a pre-construction requirement, and has been satisfied, and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Severability

This condition has been subsumed by permit template condition 12 of the facility wide permit.

- Other Applicable Regulations

This condition has been included as condition 44 of the requirements for permit unit 801.

This condition has been included as condition 42 of the requirements for permit units 805, 806, 827, 828, 829.

- Special Conditions

Special conditions, which identify or limit the use of fuel oil, have been removed. These units are permitted for the combustion of gaseous fuels only. Also, unit-specific requirements for cogenerations were not included on boiler permits.

Start-up conditions have been satisfied and are therefore obsolete. Start-up conditions have not been included in the requirements for these permit units.

Other special conditions have been included as conditions 45 through 58 of the requirements for permit unit 801.

Other special conditions have been included as conditions 16 and 43 through 55 of the requirements for permit units 805, 806.

Other special conditions have been included as conditions 43 through 56 of the requirements for permit units 827, 828, 829.

- Agency Notifications

This condition has been included as condition 59 of the requirements for permit unit 801.

This condition has been included as condition 56 of the requirements for permit units 805, 806.

This condition has been included as condition 57 of the requirements for permit units 827, 828, 829.

d. Permit SJ 85-03 & SJ 85-08

USEPA PSD permits SJ 85-03 & SJ 85-08 were issued/amended by Region IX on December 14, 1987. Conditions from this permit were addressed to define how permit terms should be incorporated into the Title V permit. The following permit units are affected by these PSD permits: 148, 149, and 151.

- Permit Expiration

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Notice Of Startup

This condition has been satisfied and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Facilities Operation

This condition has been included as condition 30 of the requirements for permit units 148, 149, and 151.

- Malfunction

This condition has been included as condition 29 of the requirements for permit units 148, 149, and 151.

- Right to Entry

This condition has been subsumed by permit template conditions 18 through 21 of the facility wide permit.

- Transfer of Ownership

This condition appears to be a pre-construction requirement, and has been satisfied, and is therefore obsolete. This condition has not been included in the requirements for this permit unit.

- Severability

This condition has been subsumed by permit template condition 12 of the facility wide permit.

- Other Applicable Regulations

This condition has not been included in the requirements for permit units 148, 149, and 151 because all applicable requirements have been addressed by TV permit.

- Special Conditions

Start-up conditions have been satisfied and are therefore obsolete. Start-up conditions have not been included in the requirements for these permit units.

Other special conditions have been included as conditions 5, 9 through 14, 18, 19, 26, 27, and 28 of the requirements for permit units 148, 149, and 151.

- Agency Notifications

This condition has been included as condition 31 of the requirements for permit units 148, 149, and 151.

## X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### A. Requirements Addressed by Model General Permit Templates

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

Permit Number	Permit Shield Conditions
S-1547-0-1	38, 39,
S-1547-1-20	12, 13, 14, 15,
S-1547-3-20	12, 13, 14, 15,
S-1547-7-20	12, 13, 14, 15,
S-1547-10-15	12, 13, 14, 15,
S-1547-13-13	12, 13, 14, 15,
S-1547-16-14	12, 13, 14, 15,
S-1547-17-21	12, 13, 14, 15,
S-1547-22	12, 13, 14, 15,
S-1547-24-15	12, 13, 14, 15,
S-1547-40-18	12, 13, 14, 15,
S-1547-59-13	11, 12, 13, 14,
S-1547-60-12	11, 12, 13, 14,
S-1547-61-13	11, 12, 13, 14,
S-1547-62-14	11, 12, 13, 14,
S-1547-65-14	11, 12, 13, 14,
S-1547-66-13	11, 12, 13, 14,
S-1547-70-16	12, 13, 14, 15,
S-1547-74-17	11, 12, 13, 14,
S-1547-75-13	11, 12, 13, 14,
S-1547-76-14	11, 12, 13, 14,
S-1547-77-12	11, 12, 13, 14,
S-1547-78-12	11, 12, 13, 14,
S-1547-86-17	11, 12, 13, 14,
S-1547-87-16	11, 12, 13, 14,
S-1547-92-11	12, 13, 14,
S-1547-94-10	12, 13, 14,
S-1547-95-10	12, 13, 14,
S-1547-96-12	12, 13, 14,
S-1547-114-8	12, 13, 14,

Permit Number	Permit Shield Conditions
S-1547-116-9	12, 13, 14,
S-1547-118-11	12, 13, 14,
S-1547-121-15	11, 12, 13, 14,
S-1547-122-15	11, 12, 13, 14,
S-1547-123-9	11, 12, 13, 14,
S-1547-125-11	12, 13, 14,
S-1547-126-10	12, 13, 14,
S-1547-127-11	12, 13, 14,
S-1547-128-10	12, 13, 14,
S-1547-130-9	12, 13, 14,
S-1547-134-9	12, 13, 14,
S-1547-139-8	12, 13, 14,
S-1547-141-17	11, 12, 13, 14,
S-1547-142-17	11, 12, 13, 14,
S-1547-143-17	11, 12, 13, 14,
S-1547-144-17	11, 12, 13, 14,
S-1547-145-14	11, 12, 13, 14,
S-1547-146-9	11, 12, 13, 14,
S-1547-152-9	11, 12, 13, 14,
S-1547-157-9	11, 12, 13, 14,
S-1547-158-9	11, 12, 13, 14,
S-1547-159-10	11, 12, 13, 14,
S-1547-164-9	11, 12, 13, 14,
S-1547-168-14	13, 14, 15, 16,
S-1547-173-21	12, 13, 14, 15,
S-1547-174-15	12, 13, 14, 15,
S-1547-175-15	13, 14, 15, 16,
S-1547-176-16	13, 14, 15, 16,
S-1547-189-12	12, 13, 14, 15,
S-1547-190-13	12, 13, 14, 15,
S-1547-234-22	12, 13, 14, 15,
S-1547-238-14	12, 13, 14, 15,
S-1547-241-9	11, 12, 13, 14,
S-1547-242-6	11, 12, 13, 14,
S-1547-243-6	11, 12, 13, 14,
S-1547-244-7	11, 12, 13, 14,
S-1547-245-6	11, 12, 13, 14,
S-1547-248-11	12, 13, 14, 15,
S-1547-250-13	11, 12, 13, 14,
S-1547-251-3	12, 13, 14,
S-1547-252-2	12, 13, 14,
S-1547-355-10	11, 12, 13, 14,
S-1547-359-8	32, 33, 34,
S-1547-361-10	11, 12, 13, 14,
S-1547-362-10	11, 12, 13, 14,

Permit Number	Permit Shield Conditions
S-1547-363-10	11, 12, 13, 14,
S-1547-569-3	12, 13, 14,
S-1547-638-5	20, 21, 22,
S-1547-656-8	11, 12, 13, 14,
S-1547-657-8	11, 12, 13, 14,
S-1547-663-3	12, 13, 14,
S-1547-666-2	12, 13, 14,
S-1547-681-2	11, 12, 13, 14,
S-1547-682-2	11, 12, 13, 14,
S-1547-683-1	11, 12, 13, 14,
S-1547-684-1	11, 12, 13, 14,
S-1547-697-12	12, 13, 14,
S-1547-699-1	10, 11,
S-1547-700-1	10, 11,
S-1547-703-1	9, 10,
S-1547-704-1	28, 29, 30,
S-1547-707-1	21, 22, 23,
S-1547-708-3	19, 20, 21,
S-1547-709-1	12, 13, 14, 15,
S-1547-714-1	34, 35, 36,
S-1547-719-1	12, 13, 14, 15,
S-1547-722-1	12, 13, 14, 15,
S-1547-723-1	12, 13, 14, 15,
S-1547-725-1	12, 13, 14, 15,
S-1547-726-1	12, 13, 14, 15,
S-1547-727-1	12, 13, 14, 15,
S-1547-728-1	12, 13, 14, 15,
S-1547-729-1	12, 13, 14, 15,
S-1547-733-1	12, 13, 14, 15,
S-1547-734-1	12, 13, 14, 15,
S-1547-735-1	12, 13, 14, 15,
S-1547-736-1	12, 13, 14, 15,
S-1547-737-1	12, 13, 14, 15,
S-1547-738-1	12, 13, 14, 15,
S-1547-742-1	12, 13, 14, 15,
S-1547-743-1	12, 13, 14, 15,
S-1547-744-1	12, 13, 14, 15,
S-1547-745-1	12, 13, 14, 15,
S-1547-746-1	12, 13, 14, 15,
S-1547-747-1	12, 13, 14, 15,
S-1547-748-1	12, 13, 14, 15,
S-1547-749-1	12, 13, 14, 15,
S-1547-751-1	12, 13, 14, 15,
S-1547-754-1	11, 12, 13, 14,
S-1547-755-1	11, 12, 13, 14,

Permit Number	Permit Shield Conditions
S-1547-756-1	11, 12, 13, 14,
S-1547-757-1	11, 12, 13, 14,
S-1547-758-1	11, 12, 13, 14,
S-1547-759-1	11, 12, 13, 14,
S-1547-760-1	11, 12, 13, 14,
S-1547-761-1	11, 12, 13, 14,
S-1547-762-1	11, 12, 13, 14,
S-1547-763-1	11, 12, 13, 14,
S-1547-764-1	11, 12, 13, 14,
S-1547-765-1	11, 12, 13, 14,
S-1547-766-1	11, 12, 13, 14,
S-1547-767-1	11, 12, 13, 14,
S-1547-768-1	11, 12, 13, 14,
S-1547-769-1	11, 12, 13, 14,
S-1547-770-1	11, 12, 13, 14,
S-1547-771-1	11, 12, 13, 14,
S-1547-772-1	11, 12, 13, 14,
S-1547-777-1	11, 12, 13, 14,
S-1547-778-1	11, 12, 13, 14,
S-1547-779-1	11, 12, 13, 14,
S-1547-780-1	11, 12, 13, 14,
S-1547-781-1	11, 12, 13, 14,
S-1547-782-1	11, 12, 13, 14,
S-1547-783-1	11, 12, 13, 14,
S-1547-784-1	11, 12, 13, 14,
S-1547-785-1	11, 12, 13, 14,
S-1547-786-1	11, 12, 13, 14,
S-1547-787-1	11, 12, 13, 14,
S-1547-788-1	11, 12, 13, 14,
S-1547-789-1	11, 12, 13, 14,
S-1547-790-1	11, 12, 13, 14,
S-1547-791-1	11, 12, 13, 14,
S-1547-792-1	11, 12, 13, 14,
S-1547-793-1	11, 12, 13, 14,
S-1547-794-1	11, 12, 13, 14,
S-1547-795-1	11, 12, 13, 14,
S-1547-796-1	11, 12, 13, 14,
S-1547-797-1	11, 12, 13, 14,
S-1547-798-1	11, 12, 13, 14,
S-1547-799-1	11, 12, 13, 14,
S-1547-800-1	11, 12, 13, 14,
S-1547-801-1	11, 12, 13, 14,
S-1547-802-1	11, 12, 13, 14,
S-1547-803-1	11, 12, 13, 14,
S-1547-804-1	11, 12, 13, 14,



Permit Number	Permit Shield Conditions
S-1547-805-1	11, 12, 13, 14,
S-1547-806-1	11, 12, 13, 14,
S-1547-807-1	11, 12, 13, 14,
S-1547-808-1	11, 12, 13, 14,
S-1547-810-1	11, 12, 13, 14,
S-1547-811-1	11, 12, 13, 14,
S-1547-812-1	11, 12, 13, 14,
S-1547-819-1	38, 39, 40,
S-1547-820-1	24, 25, 26,
S-1547-821-1	24, 25, 26,
S-1547-823-1	21, 22, 23,
S-1547-825-1	11, 12, 13, 14,
S-1547-826-1	11, 12, 13, 14,
S-1547-827-1	11, 12, 13, 14,
S-1547-828-1	11, 12, 13, 14,
S-1547-829-1	11, 12, 13, 14,
S-1547-830-1	11, 12, 13, 14,
S-1547-831-1	11, 12, 13, 14,
S-1547-832-1	11, 12, 13, 14,
S-1547-833-1	11, 12, 13, 14,
S-1547-834-1	11, 12, 13, 14,
S-1547-835-1	11, 12, 13, 14,
S-1547-836-1	11, 12, 13, 14,
S-1547-837-1	11, 12, 13, 14,
S-1547-864-1	15, 16,
S-1547-885-1	11, 12, 13, 14,
S-1547-886-1	11, 12, 13, 14,
S-1547-911-1	10, 11,
S-1547-912-1	32, 33, 34,
S-1547-913-1	18, 19, 20, 21,
S-1547-914-1	18, 19, 20, 21,
S-1547-915-1	18, 19, 20, 21,
S-1547-994-1	12, 13, 14,
S-1547-1021-1	22, 23, 24,
S-1547-1022-1	18, 19, 20, 21,
S-1547-1030-1	11, 12, 13, 14,

B. Requirements not Addressed by Model General Permit Templates

The applicant is not requesting permit shields other than as discussed in previous section.

## XI. PERMIT CONDITIONS

See draft permit conditions beginning on the following page.

# **Attachment A**

## **Detailed Facility Printout**

## **Attachment B**

### **Insignificant Activities**

Exemption Category	Rule 2020 Citation	✓	Exemption Category	Rule 2020 Citation	✓
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.2.3		Containers with a capacity $\leq$ 250 gallons used to store organic material where the actual storage temperature $<150$ F.	5.7.4	✓
Use of less than 2 gal/day of graphic arts materials.	5.4		Containers used to store unheated organic material with an initial boiling point $\geq$ 302 F.	5.7.5	✓
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	5.1.1	✓	Containers used to store fuel oils or non-air-blown asphalt with specific gravity $\geq 0.9042$ .	5.7.6	
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	5.1.2	✓	Containers used to store petroleum distillates used as motor fuel with specific gravity $\geq 0.8251$ .	5.7.7	✓
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	5.1.3		Containers used to store refined lubricating oils.	5.7.8	✓
Space heating equipment other than boilers.	5.1.4	✓	Un-vented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	5.7.9 or 5.10.4	✓
Locomotives, airplanes, and watercraft used to transport passengers or freight.	5.2		Portable tanks used exclusively to store produced fluids for $\leq$ six months.	5.7.10	✓
Cooling towers with a circulation rate less than 10,000 gal/min.	5.3		Mobile transport tanks on vehicles for delivery of VOCs.	5.7.11	✓
Equipment at retail establishments used to prepare food for human consumption.	5.5.1		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point $\geq$ 302 F or of fuel oil with specific gravity $\geq 0.8251$ .	5.8.1.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	5.5.2		Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity $\geq 0.8762$ .	5.8.1.2	✓
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	5.6		Equipment used to apply architectural coatings.	5.9.1	
Containers used to store clean produced water.	5.7.1	✓	Equipment used exclusively for the transfer of refined lubricating oil.	5.8.2	
Containers $\leq 100$ bbl used to store oil with specific gravity $\geq 0.8762$ .	5.7.2	✓	Unheated, non-conveyorized degreasers $< 10$ ft <sup>2</sup> open area; using solvents with initial boiling point $\geq 248$ F; and $< 25$ gal/yr evaporative losses.	5.9.2	✓
Containers $\leq 100$ bbl installed prior to 6/1/89 used to store oil with specific gravity $\geq 0.8762$ .	5.7.3	✓	Pits and Ponds as defined in Rule 1020.	5.10.6	✓
Brazing, soldering, or welding equipment.	5.10.1	✓	Non-structural repairs & maintenance to permitted equipment.	4.2.6	✓
Fugitive emissions sources associated with exempt equipment.	5.10.3	✓	Emissions less than 2 lb/day from units not included above.	4.2.1	✓
Equipment used to compress natural gas.	5.10.2				

## **Attachment C**

### **Former Permits**

## **Attachment D**

### **EPA PSD Permits**

## **Attachment E**

### **EPA Comments / District Response**

# District Response to EPA Comments

The following EPA comments were received regarding the proposed Title V Operating Permit for the Aera Energy LLC's Heavy Oil Western Source (District facility #S-1547). These comments are encapsulated below followed by the District's responses. A copy of the EPA comment letter (dated 10/25/02) is available at the District.

## EPA Comment

### Cyclic Wells (permit #838)

The proposed permit would authorize 60 uncontrolled cyclically steamed wells, but does not contain the emission control requirements of District Rule 4401, section 5.0. The proposed permit describes how the source could obtain a exemption that could applies to some of these wells, but does not contain any requirements to operate emissions controls for wells that are not exempt. Therefore, the District must add the emission control requirements of District Rule 4401. The District may add any potential exemptions if you also include practically enforceable conditions to verify that source would qualify for any such proposed exemption.

## District Response

Permit # 838 only authorizes 40 cyclically steamed enhanced crude oil pilot testing wells. The proposed draft permit had mistakenly stated 60 wells. Equipment description corrected to read as:

40 UNCONTROLLED CYCLICALLY STEAMED ENHANCED CRUDE OIL PILOT TESTING WELLS. - VARIED LOCATIONS

These wells are exempt from control requirements of District Rule 4401 as per section 4.3 of this rule. This exemption is stated in condition 5 of the requirements of S-1547-838-2.

## EPA Comment

### Wells (permit number 819, 820, 821, 822, 823)

The proposed permits do not consistently contain compliance requirements for the 99% reduction requirements. Some wells are subject to an annual inspection for leaks, but others do not have an explicit requirement, implying that those wells are not subject to leaks. For instance, unit permit 819 (condition #37) specifies that all components must be inspected annually while others do not. As we noted for your recent proposed vent template renewal, we recommend clarifying that source will check all of the wells annually for leaks to ensure that they do achieve 99% reduction, unless the District can demonstrate that some other frequency will assure that each well is control with a minimum of 99% efficiency.

For unit 819, the permit must contain compliance requirement for sulfur removal system. The permit currently list a number of potential sulfur removal systems, but do not contain any



operating conditions to ensure that the devices are properly operated. We agree that outlet gas sulfur content must be monitored, but the permit (conditions 17 and 18) must also specify an accurate District and EPA-approved method for monitoring the sulfur content.

For unit 822, monitoring must be added to ensure that the “Lo-Cat” system is operating between gas sampling, and the permit must also contain periodic monitoring requirements for the other sulfur removal systems, including the 95% removal efficiency in condition 16. In addition, the annual source test for sulfur emission rates is not sufficient to determine daily compliance with 494 lbs/day SO<sub>x</sub> and 247 lbs/day sulfur.

For unit 824, the permit does not contain any monitoring or sampling method daily limit of 121.03 lb/day sulfur as SO<sub>2</sub>. (Which would convert to 60.5 lbs/day sulfur, based on conversions for other permits). Therefore, sampling or monitoring must be imposed to demonstrate daily compliance with this limit...similar to our comments on the other systems.

### District Response

All these permits have been updated to assure compliance with 99% control requirement with annual inspection for leaks.

Permit	99% Control Requirement Condition	Annual Inspection Requirement Condition
S-1547-819-1	27	37
S-1547-820-1	13	23
S-1547-821-1	13	23
S-1547-823-1	10	20

As noted on EPA’s next comment, steam generators receiving gas from this scrubbing system has much more stringent SO<sub>x</sub> limits (0.002 lb/MMBtu or 3 lb/day of SO<sub>x</sub> for unit 826) and all these steam generators have EPA approved sulfur monitoring conditions. Therefore no other conditions are necessary for sulfur scrubbing permits.

### EPA Comment

#### Steam Generators:

**Several proposed Title V permits (for example 826) contain a permit shield from NSPS Subpart Dc without any basis. The District must either delete the permit shield or provide a sufficient basis for the shield in the proposed permit.**

### District Response

The basis of compliance with 40 CFR Part 60, Subpart Dc is addressed in the equipment descriptions of all active BSGs addressed in this Title V evaluation. The requirements of 40 CFR Part 60, Subpart Dc are applicable to steam generators between 10 and 100 MMBtu/hr heat input; however, the Subpart only address coal-, wood- or oil-fueled steam generators. Since all active units at the facility are limited to gaseous-firing both by equipment description and permit condition, sufficient basis is provided for

this permit shield. Further basis is already included as template condition 2 of the BSG requirements—record keeping of fuels used in the unit.

## **EPA Comment**

### ***Combustion of well vent gas and sulfur limit***

The proposed permit for unit 826 allows the combustion of well vent gas from unit number 822. Gases from unit 822 can contain up to 247 pounds of sulfur per day and 494 pounds of SO<sub>x</sub> per day (conditions 10 and 11 on proposed permit 822), and this gas may be directed to one or more of ten steam generators (condition 7 on proposed unit 822). This limit is inconsistent with the SO<sub>x</sub> limit for unit 826 of 0.002 lbs/MMBtu, or 3 lbs/day. The permit allows the facility to test the fuel source twice each year, after some initial tests (condition 7). However, this sampling schedule is inadequate for a fuel source that may contain more than one hundred times the allowable sulfur emissions from this source. Instead, the permit must require daily compliance for this limit via sampling the gas combusted in the unit, or by operating and monitoring a scrubber if the gas burned is actually higher in sulfur content than the limit allowed for this unit. The source may monitor at the outlet of gas treated (or just collected) by unit 822 and demonstrate that the concentration and quantity of outlet gas sent to this unit and the other nine units individually will comply with the unit's emission limit, or the source may monitor each individual combustion unit for compliance.

## **District Response**

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

Specifically for permit unit 826, condition 19 specifies how the emission limit of condition 18 shall be maintained while combusting vapors received from permit unit 822. Permit 822, conditions 10 and 11 do not allow 247 or 494 pounds of sulfur per day to proceed as boiler fuel for destruction; rather, that is the atmospheric emission limit. Permit 822, condition 18, requires weekly verification of 95% fuel sulfur reduction.

## **EPA Comment**

**The proposed permit for unit 826 calls for the conversion of source tests based upon an “appropriate factor” in condition 37, while the proposed permits for unit 825 and 827 contain the numerical conversion without this language (condition 20). Please delete this language from the proposed permit for unit 826, as EPA and the District have agreed for prior permits.**

**District Response:**

The District will revise the condition language for each affected permit to read as follows:

*“Emissions from this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (12/16/93), of three 30-minute test runs for NOx and CO. [District Rules 2520, 9.4.2 and 4305, 6.3]”*

## **Attachment F**

### **Public Comments / District Response**

Public comments were received from Aera Energy, LLC (Aera) and Our Children's Earth (OCE) regarding the proposed Title V Operating Permit for the Heavy Oil Western production facility (District facility S-1547). These comments are encapsulated below followed by the District's response. Copies of Aera's 10/25/2002 comment letter are available at the District. Copies of OCE's 9/30/2002 comment letter are available at the District.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator (#116, DIS# 27477-81) with O2 controller & flue gas recirculation	-114-8	Equip. Descrip.		Change equipment description from #116 to Moco #708 (South Midway)	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator (#136, Dis #28708-83) with O2 controller & flue gas recirculation (Gen Site 3474).	-126-10	Equip. Descrip.		Change steam generator ID # in equipment description from #136 to #12-2J. Add reference to approved location NW/4 Sec 12, T29S, R21E and delete reference to "(Gen Site 3474)".	Correct the Equipment Description	ATC -126-12 expired. ATCs -126-13 and -126-14 only state "various specified locations" without specifying the locations. Review project 1010527
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator (#137, Dis #28709-83) with O2 controller & flue gas recirculation (Gen Site 3474).	-127-11	Equip. Descrip. And Location		Change steam generator ID # in equipment description from #137 to #12-2K. Add reference to approved location NW/4 Sec 12, T29S, R21E and delete reference to "(Gen Site 3474)".	Correct the Equipment Description and Location	ATC -127-13 expired
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator (#706, DIS# 28710-83) with O2 controller & flue gas recirculation	-128-10	Equip. Descrip.		Change equipment description from #706 to Moco #706 (South Midway)	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas fired steam generator #36 Dis #20604-76 with flue gas recirculation - various specified locations	-13-13	Equip. Descrip.		Change equipment description from #36 to Maxwell #36 (North Midway)	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator (#180, Dis #28643-82) with O2 controller (Gen Site 1824).	-139-8	Equip. Descrip. And Location		Change steam generator ID # in equipment description from #180 to #12-2H. Delete reference to "(Gen Site 1824)".	Correct the Equipment Description and Location	Equipment description updated
Belridge 32 Cogen and PSD steam generators at MOCO and Alberta/Finley/Shale	-148, -149, -151, -780, -781, -801, -802, -805, -806, -811, -812, -829, -828, -829, -831, -885, -886, -1030	N/A		Discussion of PSD permits SJ-85-03, SJ-89-1, and SJ-89-2 was not included in engineering evaluation	Include discussion of these PSD's in the engineering evaluation	Title V permits updated to address PSD
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-159-10	22	4305, 4351	Old alternate monitoring condition. Replace with condition in revision -13, condition #3.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-159-10	23	4305, 4351	Old alternate monitoring condition. Replace with condition in ATC -159 -13, condition #4	Delete condition and replace with newer version.	Title V permit updated to current PTO

<b>Condition Text</b>	<b>Affected Permits</b>	<b>Cond. No.</b>	<b>Rule No.</b>	<b>Aera Comment</b>	<b>Action Item</b>	<b>District Response</b>
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-159-10	24	2520, 4305, 4351	Old alternate monitoring condition. Replace with condition in ATC -159 -13, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-159-10	25	4305	Old alternate monitoring condition. Replace with condition in ATC -159 -13, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Missing newer alternate monitoring conditions from revision -13	-159-10		4305	Add in conditions - #2, #6, and #8 from ATC -159-13.	Add alternate monitoring conditions	Title V permit updated to current PTO
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator #39 Dis #20625-76 with flue gas recirculation.	-16-14	Equip. Descrip.		Change steam generator ID # in equipment description from #39 to #12-2M	Correct the Equipment Description	Equipment description updated
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-168-14	21	4305	Old alternate monitoring condition. Replace with condition in ATC -168-17, condition #8.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-168-14	22	4305	Old alternate monitoring condition. Replace with condition in ATC -168-17, condition #9.	Delete condition and replace with newer version.	Title V permit updated to current PTO

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-168-14	23	4305	Old alternate monitoring condition. Replace with condition in ATC -168 -17, condition #12.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-168-14	24	4305	Old alternate monitoring condition. Replace with condition in ATC -168-17, condition #10.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Missing newer alternate monitoring conditions from revision -17	-168-14		4305	Add in conditions - #7, #11, and #13 from ATC -165-17.	Add alternate monitoring conditions	Title V permit updated to current PTO
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator #707 DIS# 21937-76 with North American burner assembly Model #NA 5131-FA-CR, O2 controller, and flue gas recirculation	-17-21	Equip. Descrip.		Change equipment description from #707 to Moco #707 (South Midway)	Correct the Equipment Description	Equipment description updated
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-173-21	30	4305	Old alternate monitoring condition. Replace with condition in ATC -173 -24, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-173-21	31	4305	Old alternate monitoring condition. Replace with condition in ATC -173 -24, condition #8.	Delete condition and replace with newer version.	Title V permit updated to current PTO

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-173-21	32	4305	Old alternate monitoring condition. Replace with condition in ATC -173-24, condition #11.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-173-21	33	4305	Old alternate monitoring condition. Replace with condition in ATC -173-24, condition #9.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Missing newer alternate monitoring conditions from revision -24	-173-21		4305	Add in conditions - #6, #10, and #12 from ATC -173-24	Add alternate monitoring conditions	Title V permit updated to current PTO
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-174-15	30	4305	Old alternate monitoring condition. Replace with condition in ATC -174-18, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-174-15	31	4305	Old alternate monitoring condition. Replace with condition in ATC -174 -18, condition #8.	Delete condition and replace with newer version.	Title V permit updated to current PTO

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-174-15	32	4305	Old alternate monitoring condition. Replace with condition in ATC -174 -18, condition #11.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-174-15	33	4305	Old alternate monitoring condition. Replace with newer condition in ATC -174-18, condition #9.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Missing newer alternate monitoring conditions from revision -24	-174-15		4305	Add in conditions - #6, #10, and #12 from ATC -174-24.	Add alternate monitoring conditions.	Title V permit updated to current PTO
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-175-15	20	4305	Old alternate monitoring condition. Replace with condition in ATC -175-20, condition #8.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-175-15	21	4305	Old alternate monitoring condition. Replace with condition in ATC -175 -20, condition #9.	Delete condition and replace with newer version.	Title V permit updated to current PTO



Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-175-15	22	4305	Old alternate monitoring condition. Replace with condition in ATC -175-20, condition #12.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-175-15	23	4305	Old alternate monitoring condition. Replace with condition in ATC -175-20, condition #10.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Missing newer alternate monitoring conditions from revision -20	-175-15		4305	Add in conditions - #7, #11, and #13 from ATC -175-20.	Add alternate monitoring conditions.	Title V permit updated to current PTO
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-176-16	21	4305	Old alternate monitoring condition. Replace with condition in ATC -176-20, condition #8.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-176-16	22	4305	Old alternate monitoring condition. Replace with condition in ATC -176 -20, condition #9.	Delete condition and replace with newer version.	Title V permit updated to current PTO

<b>Condition Text</b>	<b>Affected Permits</b>	<b>Cond. No.</b>	<b>Rule No.</b>	<b>Aera Comment</b>	<b>Action Item</b>	<b>District Response</b>
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-176-16	23	4305	Old alternate monitoring condition. Replace with condition in ATC -176 -20, condition #12.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-176-16	24	4305	Old alternate monitoring condition. Replace with condition in ATC -176-20, condition #10.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Missing newer alternate monitoring conditions from revision -20	-176-16		4305	Add in conditions - #7, #11, and #13 from ATC -176-20.	Add alternate monitoring conditions.	Title V permit updated to current PTO
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-189-12	27	4305	Old alternate monitoring condition. Replace with condition in ATC -189 -15, condition #6.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-189-12	28	4305	Old alternate monitoring condition. Replace with condition in revision -15, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-189-12	29	4305	Old alternate monitoring condition. Replace with condition in ATC -189 -15, condition #10.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-189-12	30	4305	Old alternate monitoring condition. Replace with condition in ATC -189 -15, condition #8.	Delete condition and replace with newer version.	Title V permit updated to current PTO
Add newer alternate monitoring conditions from revision -15	-189-12		4305	Add in conditions - #5, #9, and #11.	Add alternate monitoring conditions.	Title V permit updated to current PTO
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-190-13	29	4305	Old alternate monitoring condition. Replace with condition in ATC 190 -17, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-190-13	30	4305	Old alternate monitoring condition. Replace with condition in ATC -190 -17, condition #6.	Delete condition and replace with newer version.	Title V permit updated to current PTO

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-190-13	31	4305	Old alternate monitoring condition. Replace with condition in ATC -190-17, condition #9.	Delete condition and replace with newer version.	Title V permit updated to current PTO
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-190-13	32	4305	Old alternate monitoring condition. Replace with condition in ATC -190-17, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO
62.5 MMBTU/HR TEOR/natural gas fired Struthers steam generator #J-6 DIS# 4624-82 with low NOx burner, O2 analyzer/controller, & VR piping from TEOR -643 & S-1135-21	-190-13	Equip. Descrip.		Correct equipment description to read - 62.5 MMBTU/HR natural gas fired/TEOR gas fired steam generator Buena Fe #6 Dis# 4624-82 with Coen QLN Low NOx burner and VR piping from TEOR -643 and S-1135-21 various specified locations.	Change equipment description.	Title V permit updated to current PTO. Equipment description updated.
Missing newer alternate monitoring conditions from revision -17	-190-13		4305	Add in conditions - #4, #8, and #10 from ATC -190-17.	Add alternate monitoring conditions.	Title V permit updated to current PTO. Equipment description updated.
DORMANT 62.5 MMBTU/HR C.E. NATCO NATURAL GAS FIRED STEAM GENERATOR (#45 DIS# 21944-76) WITH O2 CONTROLLER	-22-15	Equipment Description		Equipment Description states erroneously that unit is dormant. It was dormant at a previous location but reactivated at the current location reflected in PTO -22. Conditions in the permit do not include any dormant provisions.	Remove the word "Dormant" from Equipment Description	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-234-22	27	4305	Old alternate monitoring condition. Replace with condition in ATC -234 -25, condition #3.	Delete condition and replace with newer version.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-234-22	28	4305	Old alternate monitoring condition. Replace with condition in ATC -234 -25, condition #4.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-234-22	29	4305	Old alternate monitoring condition. Replace with condition in ATC -234 -25, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-234-22	30	4305	Old alternate monitoring condition. Replace with condition in ATC -234 -25, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
Missing newer alternate monitoring conditions from revision -25	-234-22		4305	Add in conditions - #2, #6, and #8 from ATC -234-25.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-238-14	27	4305	Old alternate monitoring condition. Replace with condition in ATC -238 -17, condition #3.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-238-14	28	4305	Old alternate monitoring condition. Replace with condition in ATC -238 -17, condition #4.	Delete condition and replace with newer version.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-238-14	29	4305	Old alternate monitoring condition. Replace with condition in ATC -238 -17, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-238-14	30	4305	Old alternate monitoring condition. Replace with condition in ATC -238-17, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
Missing newer alternate monitoring conditions from revision -17	-238-14		4305	Add in conditions - #2, #6, and #8 from ATC -238-17.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-241-9	35	4305	Old alternate monitoring condition. Replace with condition in ATC -241 -11, condition #16.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical adjustment/settings shall be conducted at least on a weekly basis.	-241-9	36	4305	Old alternate monitoring condition. Replace with condition in ATC -241 -11, condition #17.	Correct alternate monitoring condition.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-241-9	37	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 241-11.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and take corrective action within (1) hour after detection. If the O2 concentration or the burner settings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits at the observed O2 levels and burner settings.	-241-9	38	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 241-11.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
Replace with correct FGR alternate monitoring conditions from revision -12	-241-9		4305	Add conditions from ATC - 241 -12, conditions # 3, #5, #6, #7, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-242-6	35	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 242-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical adjustment/settings shall be conducted at least on a weekly basis.	-242-6	36	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 242-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-242-6	37	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 242-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and take corrective action within (1) hour after detection. If the O2 concentration or the burner settings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits at the observed O2 levels and burner settings.	-242-6	38	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 242-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
Replace with correct FGR alternate monitoring conditions from revision -9	-242-6		4305	Add conditions from ATC - 242 -9, conditions # 3, #5, #6, #7, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-243-6	35	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 243-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical adjustment/settings shall be conducted at least on a weekly basis.	-243-6	36	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 243-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-243-6	37	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 243-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and take corrective action within (1) hour after detection. If the O2 concentration or the burner settings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits at the observed O2 levels and burner settings.	-243-6	38	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 243-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.



Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
Replace with correct FGR alternate monitoring conditions from revision -9	-243-6		4305	Add conditions from ATC - 243-9, conditions # 3, #5, #6, #7, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-244-7	35	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 244-10.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical adjustment/settings shall be conducted at least on a weekly basis.	-244-7	36	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 244-10.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-244-7	37	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 244-10.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and take corrective action within (1) hour after detection. If the O2 concentration or the burner settings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits at the observed O2 levels and burner settings.	-244-7	38	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 244-10.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
Replace with correct FGR alternate monitoring conditions from revision -10	-244-7		4305	Add conditions from ATC - 244 -10, conditions # 3, #5, #6, #7, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-245-6	35	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 245-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The stack O2 concentration measurement and inspection of mechanical adjustment/settings shall be conducted at least on a weekly basis.	-245-6	36	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 245-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-245-6	37	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 245-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and take corrective action within (1) hour after detection. If the O2 concentration or the burner settings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits at the observed O2 levels and burner settings.	-245-6	38	4305	Remove wrong low NOx burner alternate monitoring condition. Replace with correct condition from ATC - 245-9.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
Replace with correct FGR alternate monitoring conditions from revision -9	-245-6		4305	Add conditions from ATC - 245 -9, conditions # 3, #5, #6, #7, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-248-11	27	4305	Old alternate monitoring condition. Replace with newer condition in ATC -248 -14, condition #3.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-248-11	28	4305	Old alternate monitoring condition. Replace with condition in ATC -248 -14, condition #4.	Delete condition and replace with newer version.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-248-11	29	4305	Old alternate monitoring condition. Replace with condition in ATC -248 -14, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-248-11	30	4305	Old alternate monitoring condition. Replace with condition in ATC -248-14, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
Missing newer alternate monitoring conditions from revision -14	-248-11		4305	Add in conditions - #2, #6, and #8 from ATC -248-14.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory.	-251-3	8	District Rule 2520, 9.4.2	This unit is only fired on PUC regulated gas	Remove condition	Unit is not limited by equipment description or permit condition to exclusively firing PUC-regulated natural gas.
Trico Superior Heater Treater (#V-201) with two 6.3 MMBTU/HR gas-fired burners (Lockwood)	-251-3	Equip. Descrip.		Both burners were derated to < 5.0 MMBtu/hr per ATC - 251-4.	Correct equipment description	ATC -25-4 has not yet been implemented.
If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory.	-252-2	8	District Rule 2520, 9.4.2	This unit is only fired on PUC regulated gas	Remove condition	Unit is not limited by equipment description or permit condition to exclusively firing PUC-regulated natural gas.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
4,200,000 GALLON EXTERNAL FLOATING ROOF CRUDE OIL STORAGE TANK T-485 WITH MECHANICAL SHOE PRIMARY SEAL AND ZERO GAP WIPER-TYPE SECONDARY SEAL (ALSO PERMITTED AS S-1548-141 IN LOW SS)	-261-1	Equip. Descrip.	NA	The equipment description inaccurately lists the secondary seal as meeting the zero-gap criteria. The permit conditions reflect the requirements for mechanical shoe primary seal with a secondary wiper and not zero-gap requirements. As currently written, the equipment description conflicts with the permit conditions.	Remove the phrase "zero-gap" from the Equipment Description	Equipment description updated
For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company.	-359-8	22	District Rule 4401, 5.4	Condition does not apply. Permit will have more than 10 cyclic wells.	Remove condition	This condition applies to all facility-wide properties, therefore can not be removed.
VAPOR COLLECTION AND CONTROL SYSTEM SERVING 1657 THERMALLY ENHANCED WELLS IN SECTIONS 1, 2, 3, 4, 10, 11, 12, 33, 34, 35 T28S, R21E, OIL/WATER SEPARATORS, FWKO'S, HEATER TREATERS, CONDENSATE TREATERS, SURGE VESSELS, STATIC FLOTATION UNITS AND TANKS	-359-8	Equipment description		Current description does not include Township and Range numbers for sections 1, 2, 3, 4, 10, 11, and 12	Add correct Township and Range number for the subject sections - T29S R21E	Equipment description updated
100.5 HP WEMCO MODEL 120X AIR FLOTATION OIL/WATER SEPARATOR #V102A WITH VAPOR PIPING TO HEAVY OIL DEHYDRATION FACILITY VAPOR RECOVERY SYSTEM AUTHORIZED BY - 353 (DEHY 27)	-430-2	Equip. Descrip.		The APCD has added the "100.5 hp" rating to this unit. The 0.5 hp is from the use of two 0.25 hp skim pumps. 0.25 hp pumps are difficult to locate and must often be replaced by larger pumps. Aera has been removing the horsepower ratings from the Wemcos in order to avoid having to modify the permit for a minor motor change which does not affect the emissions from the unit.	Remove the "100.5 hp" reference in the equipment description.	Equipment description updated
100.5 HP WEMCO MODEL 120X AIR FLOTATION OIL/WATER SEPARATOR #V102B WITH VAPOR PIPING TO HEAVY OIL DEHYDRATION FACILITY VAPOR RECOVERY SYSTEM AUTHORIZED BY - 353 (DEHY 27)	-431-2	Equip. Descrip.		The APCD has added the "100.5 hp" rating to this unit. The 0.5 hp is from the use of two 0.25 hp skim pumps. 0.25 hp pumps are difficult to locate and must often be replaced by larger pumps. Aera has been removing the horsepower ratings from the Wemcos in order to avoid having to modify the permit for a minor motor change which does not affect the emissions from the unit.	Remove the "100.5 hp" reference in the equipment description.	Equipment description updated

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
100.5 HP WEMCO MODEL 120X AIR FLOATATION OIL/WATER SEPARATOR #V102C WITH VAPOR PIPING TO HEAVY OIL DEHYDRATION FACILITY VAPOR RECOVERY SYSTEM AUTHORIZED BY - 353 (DEHY 27)	-432-2	Equip. Descrip.		The APCD has added the "100.5 hp" rating to this unit. The 0.5 hp is from the use of two 0.25 hp skim pumps. 0.25 hp pumps are difficult to locate and must often be replaced by larger pumps. Aera has been removing the horsepower ratings from the Wemcos in order to avoid having to modify the permit for a minor motor change which does not affect the emissions from the unit.	Remove the "100.5 hp" reference in the equipment description.	Equipment description updated
100.5 HP WEMCO MODEL 120X AIR FLOATATION OIL/WATER SEPARATOR #V102D WITH VAPOR PIPING TO HEAVY OIL DEHYDRATION FACILITY VAPOR RECOVERY SYSTEM AUTHORIZED BY - 353 (DEHY 27)	-433-2	Equip. Descrip.		The APCD has added the "100.5 hp" rating to this unit. The 0.5 hp is from the use of two 0.25 hp skim pumps. 0.25 hp pumps are difficult to locate and must often be replaced by larger pumps. Aera has been removing the horsepower ratings from the Wemcos in order to avoid having to modify the permit for a minor motor change which does not affect the emissions from the unit.	Remove the "100.5 hp" reference in the equipment description.	Equipment description updated
100.5 HP WEMCO MODEL 120X AIR FLOATATION OIL/WATER SEPARATOR #V102E WITH VAPOR PIPING TO HEAVY OIL DEHYDRATION FACILITY VAPOR RECOVERY SYSTEM AUTHORIZED BY - 353 (DEHY 27)	-434-2	Equip. Descrip.		The APCD has added the "100.5 hp" rating to this unit. The 0.5 hp is from the use of two 0.25 hp skim pumps. 0.25 hp pumps are difficult to locate and must often be replaced by larger pumps. Aera has been removing the horsepower ratings from the Wemcos in order to avoid having to modify the permit for a minor motor change which does not affect the emissions from the unit.	Remove the "100.5 hp" reference in the equipment description.	Equipment description updated
84,000 Gallon fixed roof, 29.7 ft. diameter X 16 ft. high, stock tank T-160 connected to vapor control system (Lockwood Dehy)	-587-3	Equipment description		Treaters, knockouts and Republic gas tie to this tank	Add treaters, knockouts and Republic gas to T-160 equipment description	This is covered under permit unit S-1547-441 (lowest number permit for vapor recovery system)
True vapor pressure of stored liquids shall be less than 0.5 psia.	-623-1 -627-1 -628-1 -629-1 -630-1 -924-1 -986-1 -1038-1 -1039-1 -1040-1 -1041-1 -1042-1 -1064-2 -1065-1 -1066-1 -1071-1 -1072-1 -1073-1 -1087-1	1	4623	This tank has been cleaned and is out of service. It is not possible to estimate the vapor pressure the fluids that may enter the tank in the future. The permit should allow for the tank to store fluids greater than 0.5 psia if the tank is properly retrofitted to address Rule 4623.	Revise condition to read, "prior to storing liquids with a true vapor pressure greater than 0.5 psia, the permittee shall apply to modify the Title V permit to address the applicable requirements of Rules 4623 and 2520, Section 9.0."	Storing liquids with TVP > 0.5 psia will require Authority to Construct as per Section 3.0 of District Rule 2010. Therefore no revision to condition is necessary.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
True vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph, as approved by ARB and EPA.	-623-1 -627-1 -628-1 -629-1 -630-1 -924-1 -986-1 -1038-1 -1039-1 -1040-1 -1041-1 -1042-1 -1064-2 -1065-1 -1066-1 -1071-1 -1072-1 -1073-1 -1087-1	2	4623	This tank has been cleaned and is out of service. As currently written, Aera would have to introduce fluids into the tank once every two years and grab a vapor pressure sample in order to comply with this condition.	Revise condition to read, "when storing liquids in the tank, the true vapor pressure shall be measured at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored using the latest version of the Lawrence Berkeley National Laboratory Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph, as approved by ARB and EPA."	District Rule 4623 does not allow such provisions. Aera will have to file a deviation report for not testing for TVP stating that tank is empty or out of service.
Operator shall submit the records of TVP testing to the District within 45 days after the date of testing. The record shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results.	-623-1 -627-1 -628-1 -629-1 -630-1 -924-1 -986-1 -1038-1 -1039-1 -1040-1 -1041-1 -1042-1 -1064-2 -1065-1 -1066-1 -1071-1 -1072-1 -1073-1 -1087-1	3	4623	This tank has been cleaned and is out of service. As currently written, Aera would have to introduce fluids into the tank once every two years and grab a vapor pressure sample in order to comply with this condition.	Revise condition to read, "when storing liquids in the tank, operator shall submit the records of TVP testing to the District within 45 days after the date of testing. The record shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the stored organic liquid, test methods used, and a copy of the test results."	District Rule 4623 does not allow such provisions. Aera will have to file a deviation report for not testing for TVP stating that tank is empty or out of service.
For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company.	-638-5	10	District Rule 4401, 5.4	Condition does not apply. Permit will have more than 10 cyclic wells.	Remove condition	This conditions applies to all facility-wide properties, therefore con not be removed.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-656-8	19	4305	Old alternate monitoring condition. Replace with condition in ATC -656 -11, condition #3.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-656-8	20	4305	Old alternate monitoring condition. Replace with condition in ATC -656 -11, condition #4.	Delete condition and replace with newer version.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-656-8	21	4305	Old alternate monitoring condition. Replace with condition in ATC -656 -11, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-656-8	22	4305	Old alternate monitoring condition. Replace with condition in ATC -656-11, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
Add newer alternate monitoring conditions from revision -11	-656-8		4305	Add in conditions - #2, #6, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
The acceptable range of stack O2 concentration and visible mechanical burner setting shall be established by testing emissions from this unit or other representative units as approved by the District. The acceptable range shall be that for which compliance with applicable NOx and CO emissions rates have been demonstrated through source testing.	-657-8	26	4305	Old alternate monitoring condition. Replace with condition in ATC -657-11, condition #3.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
The stack O2 concentration measurement and inspection of mechanical settings shall be conducted at least on a weekly basis.	-657-8	27	4305	Old alternate monitoring condition. Replace with condition in ATC -657-11, condition #4.	Delete condition and replace with newer version.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The permittee shall maintain records of the date and time of O2 measurement and burner adjustments, the measured O2 concentration (% by volume), and the observed setting for he burner register louvers. The records must also include a description of any corrective action taken to maintain the O2 concentration and the burner mechanical settings within the acceptable range. These records shall be retained at the premises for a period of no less than five years and shall be made available for District inspection upon request.	-657-8	28	4305	Old alternate monitoring condition. Replace with condition in ATC -657-11, condition #7.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
If the O2 concentration or the burner mechanical setting deviate from the acceptable range, the permittee shall notify the District and return the O2 concentration or burner mechanical settings to within the acceptable range as soon as possible but no longer than (1) hour after detection. If the O2 concentration or the burner settings are not returned to within the acceptable range within one hour, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emission limits.	-657-8	29	4305	Old alternate monitoring condition. Replace with condition in ATC -657-11, condition #5.	Delete condition and replace with newer version.	Title V permit updated to current PTO.
Add newer alternate monitoring conditions from revision -11	-657-8		4305	Add in conditions - #2, #6, and #8.	Add alternate monitoring conditions.	Title V permit updated to current PTO.
When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance.	-663-3	7	District Rule 2520, 9.4.2	This unit is equipped with burners that are rated < 5.0 MMBtu/hr each and it is exempt from annual tune-ups per Rule 4305.	Remove condition	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.
If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory.	-663-3	8	District Rule 2520, 9.4.2	This unit is only fired on PUC regulated gas	Remove condition	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.



Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
Natural gas/LPG fired heater treater (#V-203) with two 7.0 MMBTU/HR burners (Lockwood)	-663-3	Equip. Descrip.		This unit is equipped with two separate burners that were derated to < 5.0 MMBtu/hr per ATC -663-4.	Correct equipment description.	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.
When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance.	-664-4	7	District Rule 2520, 9.4.2	This unit is equipped with one burner rated at 2.63 MMBtu/hr as shown on ATC -664-5 and is exempt from annual tune-ups per Rule 4305.	Remove condition	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.
If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072-80, D 3031-81, D 4084-82, D 3246-81 or grab sample analysis by GC-FPD/TCD performed in the laboratory.	-664-4	8	District Rule 2520, 9.4.2	This unit is only fired on PUC regulated gas	Remove condition	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.
6.3 MMBTU/HR gas-fired heater treater (#V-204) (Lockwood Dehy)	-664-4	Equip. Descrip.		Burner description is wrong. Unit is equipped with a 2.63 MMBtu/hr natural draft burner as shown on ATC -664-5.	Correct equipment description.	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.
Unit shall be tuned at least once each calendar year in which it operates by a qualified technician in accordance with Rule 4304.	-666	18	District Rule 2520, 9.4.2	This unit is equipped with burners that are rated < 5.0 MMBtu/hr each and it is exempt from annual tune-ups per Rule 4305.	Remove condition	Compliance Inspection required prior to implementing these changes. Title V permit reflects current PTO.
6.3 MMBTU/HR gas-fired heater treater #1 (National Dehy)	-667-2	Equip. Descrip.		The current permit equipment description (-667-3) is "Gas Fired Heater Treater #1 with one 4.8 MMBtu/hr Burner (National)"	Correct equipment description.	Equipment description updated
Unit shall be tuned at least once each calendar year in which it operates by a qualified technician in accordance with Rule 4304.	-668	16	District Rule 2520, 9.4.2	This unit is equipped with one burner rated at < 5.0 MMBtu/hr as shown on ATC -668-3 and is exempt from annual tune-ups per Rule 4305.	Remove condition.	Title V permit updated to current PTO.
6.3 MMBTU/HR NATURAL GAS FIRED HEATER TREATER (#2) (NATIONAL)	-668	Equip. Descrip.		Unit only has one burner rated at < 5.0 MMBtu/hr as shown on ATC -668-3.	Correct equipment condition.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
Annual test results submitted to the District from unit(s) representing a group of units may be used to measure NOx and CO emissions of this permit for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test. (This requirement shall not supersede a more stringent NSR or PSD permit testing requirement).	-682-2	15	4305, 4351	Representative testing condition is not needed for this unit.	Remove condition.	Title V permit updated to current PTO.
The following conditions must be met for representative unit(s) to be used to test for NOx and CO limits for a group of units: 1) all units are initially source tested and emissions from each unit in group are less than 90% of the permitted value and vary 25% or less from the average of all runs, 2) all units in group are similar in terms of rated heat input, make and series, operation conditions, and control method, and 3) the group is owned by a single owner and located at a single stationary source.	-682-2	16	4305	Representative testing condition is not needed for this unit.	Remove condition.	Title V permit updated to current PTO.
All units in a group for which representative units are source for NOx and CO emissions shall have received the same maintenance and tune-up procedures as the representative unit(s). These tune-up procedures shall be completed according to District Rule 4304 (Adopted October 19, 1995) and tune-up test results shall show comparable results for each unit in the group. Records shall be maintained for the each unit of the group including all preventative and corrective maintenance work done.	-682-2	17	4305	Representative testing condition is not needed for this unit.	Remove condition.	Title V permit updated to current PTO.
All units in a group for which representative units are source tested to for NOx and CO emissions of this permit shall be fired on the same fuel type during the entire compliance period. If a unit switches for any time to an alternate fuel type (e.g. from natural gas to oil) then that unit shall not be considered part of the group and shall be required to undergo a source test for all fuel types used, within one year of the switch.	-682-2	18	4305	Representative testing condition is not needed for this unit.	Remove condition.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The number of representative units source tested for NOx and CO emissions shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that in 3 years, all units in the entire group will have been tested at least once.	-682-2	19	4305	Representative testing condition is not needed for this unit.	Remove condition.	Title V permit updated to current PTO.
Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy testing requirements provided this group of engines is owned and operated by a single owner/operator.	-699	8	District Rule 2520, 9.4.2	For engines that are described as emergency engines in the equipment description, testing is not required.	Remove this condition on all engines designated for emergency use in the equipment description.	This is a template condition and can not be removed.
Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy testing requirements provided this group of engines is owned and operated by a single owner/operator.	-700	8	District Rule 2520, 9.4.2	For engines that are described as emergency engines in the equipment description, testing is not required.	Remove this condition on all engines designated for emergency use in the equipment description.	This is a template condition and can not be removed.
Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy testing requirements provided this group of engines is owned and operated by a single owner/operator.	-703	7	District Rule 2520, 9.4.2	For engines that are described as emergency engines in the equipment description, testing is not required.	Remove this condition on all engines designated for emergency use in the equipment description.	This is a template condition and can not be removed.
The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 200 hours per year.	-703	13	District Rule 4701	Condition repeats itself introducing cause for confusion.	Replace Condition #13 on Permit -703-1 with Condition #4 on Permit -703-0, "Engine shall not operate for more than 200 hours per calendar year for non-emergency purposes."	Condition 13 defined non-emergency situations and therefore will remain as is.
The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the number of hours of operation, the purpose of the operation (e.g., load testing, weekly testing, rolling blackout, general area power outage, etc.), and the sulfur content of the diesel fuel used. Such records shall be made available for District inspection upon request.	-703	14	District Rule 1070	Condition states the "... sulfur content of the diesel fuel used." - This is a gasoline burning engine.	Replace condition with wording that correctly portrays the requirements of the equipment that is permitted.	Condition has been revised
For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company.	-704	18	District Rule 4401, 5.4	Condition does not apply. Permit will have more than 10 cyclic wells.	Remove condition	This condition applies to all facility-wide properties, therefore can not be removed.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
THERMALLY ENHANCED OIL RECOVERY OPERATION CONSISTING OF 26 STEAM-ENHANCED CRUDE OIL PRODUCTION WELLS WITH VENTS PIPED TO VAPOR CONTROL SYSTEM S-1457-377. CYMRIC FIELD	-704	Equipment description		Current description does not include implemented ATC of 41 production wells. ATC - 704-3 implemented during June/July 2002	Incorporate implemented revision	Equipment description updated
For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company.	-714	29	District Rule 4401, 5.4	Condition does not apply. Permit will have more than 10 cyclic wells.	Remove condition	This condition applies to all facility-wide properties, therefore can not be removed.
62.5 MMBTU/HR C.E. Natco natural gas fired steam generator #30 Dis #19960-74 with O2 controller & flue gas recirculation.	-7-20	Equip. Descrip.		Change steam generator ID # in equipment description from #30 to #12-2L	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas fired steam generator (#11-1A) with flue gas recirculation.	-782-1	Equip. Descrip.		Add "(Belridge)" location reference at the end of the equipment description.	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas fired steam generator (#11-1B) with flue gas recirculation.	-783-1	Equip. Descrip.		Add "(Belridge)" location reference at the end of the equipment description.	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas fired steam generator (#11-1B) with flue gas recirculation.	-784-1	Equip. Descrip.		Change steam generator ID # in equipment description from #11-1B to #11-1C. Add "(Belridge)" location reference at the end of the equipment description.	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas fired steam generator (#11-1D) with flue gas recirculation.	-785-1	Equip. Descrip.		Add "(Belridge)" location reference at the end of the equipment description.	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas fired steam generator (#11-1E) with flue gas recirculation.	-786-1	Equip. Descrip.		Add "(Belridge)" location reference at the end of the equipment description.	Correct the Equipment Description	Equipment description updated
Except during periods of steam generator startup/shutdown, steam generator shall not be operated unless flue gas recirculation system is operating.	-801-1	25	4305, 5.4.2	Condition has been removed from according to ATC -801-4.	Remove condition.	Title V permit updated to current PTO.
The acceptable range of flue gas recirculation (FGR) valve settings shall be established by testing emissions from this or other representative unit(s) as approved by the District. The acceptable maximum and minimum FGR valve settings shall be the settings with which compliance with applicable NOx and CO emission rates have been demonstrated through District approved source testing.	-801-1	26	4305, 5.4.2	Replace with condition #7 in ATC -801-4.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
The acceptable range of FGR valve positions shall be documented for each unit in a District approved plan. Permittee shall maintain a copy of the current plan with the permit to operate.	-801-1	27	4305, 5.4.2	Replace with condition #10 in ATC -801-4.	Correct alternate monitoring condition.	Title V permit updated to current PTO.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
If the flue gas recirculation valve setting deviates from the acceptable range, the permittee shall notify the District and take corrective action within one (1) hour after detection. If the flue gas recirculation valve settings are not corrected promptly, the permittee shall conduct an emissions test within 60 days, utilizing District-approved test methods, to demonstrate compliance with the applicable emissions limits at the observed flue gas recirculation valve setting.	-801-1	28	4305, 5.4.2	Replace with condition #9 in ATC -801-4.	Correct alternate monitoring condition.	Title V permit updated to current PTO.
Permittee shall record the FGR valve position and date and time when the FGR valve position was checked on a weekly basis. Permittee shall record any corrective action taken to maintain the FGR setting within the acceptable range. Permittee shall maintain records of date and duration of each startup and each shut down. Records shall be retained for a period of two years and shall be made readily available for District inspection upon request.	-801-1	29	2520, 9.4.2	Replace with condition #11 in ATC -801-4.	Correct alternate monitoring conditions.	Title V permit updated to current PTO.
Add alternate monitoring conditions from revision -4.	-801-1		4305	Add in conditions - #8, and #12.	Add alternate monitoring condition.	Title V permit updated to current PTO.
62.5 MMBTU/HR natural gas/vapor recovery gas fired steam generator (#3-2I) with flue gas recirculation and non-condensable piping from vapor control system -359 (Belridge).	-834-1	Equip. Descrip.		Change steam generator ID # in equipment description from #3-2I to #2-3I.	Correct the Equipment Description	Equipment description updated
62.5 MMBTU/HR natural gas/vapor recovery gas fired steam generator (#3-2J) with flue gas recirculation and non-condensable piping from vapor control system -359 (Belridge).	-835-1	Equip. Descrip.		Change steam generator ID # in equipment description from #3-2J to #2-3J.	Correct the Equipment Description	Equipment description updated
Total number of uncontrolled cyclic wells exempt from control requirements pursuant to Rule 4401 section 4.5 shall not exceed 20.	-838-2	8	District Rule 4401, 4.5	Another permit (-536) governs the use of the 20 uncontrolled cyclic wells. Permit -838 governs the use of up to 40 cyclic wells undergoing pilot testing and exempt from control according to Rule 4401 Section 4.3. A limit related to Rule 4401 Section 4.5 is not relevant or appropriate for this permit.	Remove this condition	This condition applies to all facility-wide properties, therefore can not be removed.
60 UNCONTROLLED CYCLICALLY STEAMED ENHANCED CRUDE OIL PRODUCTION WELLS. - VARIED LOCATIONS	-838-2	Equipment description		Equipment Description states: "60 Uncontrolled cyclically steamed enhanced crude oil production wells - varied locations". However, the permit only authorizes 40 wells undergoing pilot testing as allowed in Rule 4401 Section 4.3.	Correct the equipment description	Equipment description updated

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling.	-854-1 -855-1 -856-1 -857-1 -858-1 -859-1 -860-1 -861-1 -862-1 -863-1	13 9 9 9 9 9 9 9 4 4	4623	The permit also allows for the vapor recovery equipment to be non-gas tight during maintenance and tank cleaning.	Revise condition to read, "any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging, sampling, maintenance, or tank cleaning."	Section 5.6.2 of District Rule 4623 does not allow requested revision in condition language.
The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting.	-854-1 -855-1 -856-1 -857-1 -858-1 -859-1 -860-1 -861-1 -862-1 -863-1	23 19 19 19 19 19 19 19 17 17	4623	The permit also allows for the vapor recovery equipment to be non-functional during maintenance and tank cleaning. Also, as stated in other comments, the vapor recovery compressors to do not activate based on tank pressure.	Revise condition to read, " the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times, except during periods of vapor control system maintenance, power curtailments, and tank or knockout vessel cleaning."	District Rule 4623 does not allow such provisions. Aera will have to file a deviation report for vapor recovery system maintenance.
The permittee shall operate and maintain a continuous monitoring and recording system to measure oxides of nitrogen, carbon monoxide, and oxygen or carbon dioxide.	-879-1 -880-1 -881-1	15, 17, 18, 19, 20, 21, 22, 23, 24 & 32	4703	Rule 4703, 6.2.1 allows alternate monitoring in lieu of CEM systems for units < 10 MW.	Remove conditions 15, 17, 18, 19, 20, 21, 22, 23, 24 & 32.	NSR Rule requires CEMS for these units; therefore these conditions can not be removed.
The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times and shall monitor vapor recovery compressor activation and shut off manometer pressures on quarterly basis to ensure that compressor activation pressure does not exceed pressure relief valve setting.	-890-1 -891-1	15 15	2520, 9.4.2	The permit also allows for the vapor recovery equipment to be non-functional during maintenance, power outages, and tank cleaning. Also, as stated in other comments, the vapor recovery compressors to do not activate based on tank pressure.	Revise condition to read, " the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times, except during periods of vapor control system maintenance, power outages, and tank or knockout vessel cleaning."	District Rule 4623 does not allow such provisions. Aera will have to file a deviation report for vapor recovery system maintenance.
The operator shall ensure that the vapor recovery system is functional and is operating as designed at all times.	-892-1 -893-1 -894-1 -895-1 -896-1 -897-1 -898-1 -899-1 -900-1 -901-1 -902-1 -903-1 -904-1 -905-1 -906-1 -988-1 -989-1 -990-1 -991-1 -992-2 -1019-1	15 15 15 15 15 14 14 27 27 14 14 14 14 15 20 20 20 20 20 13	District Rule 2520, 9.4.2	The permit also allows for the vapor recovery equipment to be non-functional during maintenance, power outages, and tank cleaning. Also, as stated in other comments, the vapor recovery compressors to do not activate based on tank pressure.	Revise condition to read, " the operator shall ensure that the vapor recovery system is functional and is operating as designed at all times, except during periods of vapor control system maintenance, power outages, and tank or knockout vessel cleaning."	District Rule 4623 does not allow such provisions. Aera will have to file a deviation report for vapor recovery system maintenance.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy testing requirements provided this group of engines is owned and operated by a single owner/operator.	-911	8	District Rule 2520, 9.4.2	For engines that are described as emergency engines in the equipment description, testing is not required.	Remove this condition on all engines designated for emergency use in the equipment description.	This is a template condition and can not be removed.
True vapor pressure of stored liquids shall be less than 0.5 psia.	-917-1 -918-1 -919-1 -920-1 -921-1 -987-1 -1043-1 -1044-1 -1045-1 -1067-1	1	4623	The APCD is attempting to incorporate the requirements of Rule 4623, which requires that uncontrolled tanks have a vapor pressure less than 0.5 psia or retrofits must be incorporated. This type of flexibility should be retained in the permit condition.	Revise condition to read, "prior to storing liquids with a true vapor pressure greater than 0.5 psia, the permittee shall apply to modify the Title V permit to address the applicable requirements of Rules 4623 and 2520, Section 9.0."	Storing liquids with TVP > 0.5 psia will require Authority to Construct as per Section 3.0 of District Rule 2010. Therefore no revision to condition is necessary.
84,000 GALLON FIXED ROOF RECLAIM TANK F-4205 VENTED TO VAPOR CONTROL SYSTEM LISTED ON -359 - SOUTH BELRIDGE FIELD	-947-1	Equip. Descrip.		The description of this tank has been mistakenly changed to match -946-1.	Revise to read, "42,000 GALLON FIXED ROOF RECLAIM TANK F-4204 VENTED TO VAPOR CONTROL SYSTEM LISTED ON -359 - SOUTH BELRIDGE FIELD"	Equipment description updated
5.54 MM BTU/HR GAS-FIRED HEATER TREATER WITH SHARED VAPOR CONTROL (LOST HILLS)	-988-1	Equip description		Unit is equipped with 2 separate burners rated at 2.77 MMBtu each as shown in ATC -988-2	Correct equipment description	Compliance Inspection required prior to implementing these changes.
9.24 MM BTU/HR GAS-FIRED HEATER TREATER (LOST HILLS)	-989-1	Equipment description		Unit is equipped with 2 separate burners rated at 4.6 MMBtu each as shown in ATC -989-2.	Correct equipment description	Compliance Inspection required prior to implementing these changes.
8.6 MM BTU/HR GAS-FIRED HEATER TREATER WITH SHARED VAPOR CONTROL (LOST HILLS)	-990-1	Equipment description		Unit is equipped with 2 separate burners rated at 4.3 MMBtu each as shown in ATC -990-2.	Correct equipment description	Compliance Inspection required prior to implementing these changes.
8.6 MM BTU/HR GAS-FIRED HEATER TREATER WITH SHARED VAPOR CONTROL (LOST HILLS)	-991-1	Equipment description		Unit is equipped with 2 separate burners rated at 4.3 MMBtu each as shown in ATC -991-2.	Correct equipment description	Compliance Inspection required prior to implementing these changes.
8.6 MM BTU/HR GAS-FIRED HEATER TREATER WITH SHARED VAPOR CONTROL (LOST HILLS)	-992-2	Equipment description		Unit is equipped with 2 separate burners rated at 4.3 MMBtu each as shown in ATC -992-2.	Correct equipment description	Compliance Inspection required prior to implementing these changes.
Test results submitted to the District from unit(s) representing a group of units may be used to demonstrate compliance with NOx limits for that group, provided the selection of the representative unit(s) is approved by the APCO prior to testing. Should any of the representative units exceed the required NOx emission limits of this permit, each of the units in the group shall demonstrate compliance by emissions testing within 90 days of the failed test.	-994-1	12	4305	This is a representative testing condition for NOx that is not needed.	Remove condition.	This condition has been removed.

Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
The following conditions must be met for representative unit(s) used to demonstrate compliance for NOx limits for a group of units: 1) all units are initially source tested and emissions from all units in group are similar, 2) all units in group are similar in terms of rated heat input, make and series, operation conditions, fuel used, and control method, 3) the group is owned by a single owner and located at a single stationary source, and 4) all units in the group shall have received the same maintenance and tune-up procedures as the representative unit(s).	-994-1	13	4305	This is a representative testing condition for NOx that is not needed.	Remove condition.	This condition has been removed.
The number of representative units source tested to demonstrate compliance for NOx limits shall be at least 30% of the total number of units in the group. The units included in the 30% shall be rotated, so that when 3 source test cycles have been completed, all units in the entire group will have been tested.	-994-1	14	2520	This is a representative testing condition for NOx that is not needed.	Remove condition.	This condition has been removed.
Nitrogen oxide (NOx) emission concentrations in ppmv shall be referenced at dry stack gas conditions, and shall be calculated to 3.00 percent by volume stack gas oxygen and averaged over 60 minutes, and lb/MMBtu rates shall be calculated as lb NO2/MMBtu of heat input (hmv).	-994-1	15	4351	Unit is exempt from NOx source testing per Rule 4305.	Remove condition.	This condition has been removed. However, the NSR requirement cannot be removed through the Title V process.
Nitrogen oxide (NOx) emissions shall not exceed 0.10 lb NOx/MMBtu or 95 ppmv.	-994-1	16	4301, 4305, 408	Unit is exempt from NOx source testing per Rule 4305.	Remove condition.	This condition has been removed. However, the NSR requirement cannot be removed through the Title V process.
8.4 MMBTU/HR gas-fired heater treater with vapor control (North Midway)	-994-1	Equip. Descrip.		This unit is equipped with two separate 4.0 MMBtu/hr burners as shown on ATC - 994-2.	Correct equipment description and remove all reference to NOx source testing.	Compliance Inspection required prior to implementing these changes.
17.2 MMBTU/HR gas-fired heater treater with vapor control - North Midway	-995-2	Equip. Descrip.		Unit is equipped with two separate burners that have been derated to < 5.0 MMBtu/hr as shown on ATC -995-3.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
17.2 MMBTU/HR gas-fired heater treater with vapor control - North Midway	-998-2	Equip. Descrip.		Unit is equipped with two separate burners that have been derated to < 5.0 MMBtu/hr as shown on ATC -998-3.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
17.2 MMBTU/HR gas-fired heater treater with vapor control - North Midway	-999-2	Equip. Descrip.		Unit is equipped with two separate burners that have been derated to < 5.0 MMBtu/hr as shown on ATC -999-3.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
17.2 MMBTU/HR gas-fired heater treater with vapor control - North Midway	-1000-2	Equip. Descrip.		Unit is equipped with two separate burners that have been derated to < 5.0 MMBtu/hr as shown on ATC -1000-3.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.



Condition Text	Affected Permits	Cond. No.	Rule No.	Aera Comment	Action Item	District Response
17.2 MMBTU/HR gas-fired heater treater with vapor control - North Midway	-1001-2	Equip. Descrip.		Unit is equipped with two separate burners that have been derated to < 5.0 MMBtu/hr as shown on ATC -1001-3.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
5.8 MMBTU/HR gas-fired heater treater (North Midway)	-1002-1	Equip. Descrip.		Unit is equipped with two separate burners rated at 2.9 MMBtu/hr each as shown on ATC -1002-2.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
8.4 MMBTU/HR gas-fired heater theater vented to vapor control system listed on -912 (North Midway)	-1003-1	Equip. Descrip.		Unit is equipped with two separate burners rated at 4.2 MMBtu/hr each as shown on ATC -1003-2.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
7.1 MMBTU/HR gas-fired heater theater vented to vapor control system listed on -912 (North Midway)	-1004-1	Equip. Descrip.		Unit is equipped with two separate burners rated at 2.9 MMBtu/hr and 4.2 MMBtu/hr as shown on ATC -1004-2.	Correct equipment description.	Compliance Inspection required prior to implementing these changes.
FREE-WATER KNOCKOUT (FWKO) VASSEL WITH VAPOR RECOVERY (SOUDAN LEASE). - NORTH MIDWAY	-1023-1	Equip. Descrip.		"Vessel" is misspelled in the equipment description	Correct spelling	Spelling has been corrected.
THERMALLY ENHANCED OIL RECOVERY OPERATION SERVING 146 WELLS, WITH VAPOR RECOVERY SHARED WITH -1097, INCLUDING G/L SEPARATOR, WATER-COOLED HEAT EXCHANGER, & 20' VERTICAL AIR ASSIST FLARE. (TAYLOR LEASE).	-1063-4	Equipment description		Current description needs to have S-154-1097 removed (permit was cancelled). ATC -1063-3 for this condition has already been implemented.	Incorporate implemented revision	Equipment description updated
THERMALLY-ENHANCED OIL RECOVERY OPERATION WITH 75 STEAM DRIVE WELLS WITH CASING VENT VAPOR COLLECTION AND CONTROL SYSTEM INCLUDING TWO AIR-COOLED HEAT EXCHANGERS AND TWO GAS COMPRESSORS.	-1079-4	Equipment description		Current description missing the correct number of wells (131) from implemented ATC -1079-4.	Incorporate implemented revision	Equipment description updated
75 HP CRUDE OIL TRUCK LOADING RACK INCLUDING LOADING ARM WITH DRY BREAK FITTING, VAPOR RETURN LINE WITH PIPING TO VAPOR RECOVERY SYSTEM ON PERMIT S-1548-403 INCLUDING DRY BREAK COUPLER AND 75 HP LOADING PUMP.	-1094-1	All		In an August 21, 2002 letter to the San Joaquin Valley Air Pollution Control District, Aera requested that this permit be cancelled.	Cancel this permit.	Permit is cancelled.

**Equilon Enterprises (S-34); Kern Oil and Refining (S-37); Tricor Refining, LLC (S-44), AERA Energy, (S-1547) Comments**

**I. General Permit Template Usage–Tricor Refinery, Kern Oil, and Aera Energy**

**OCE Comment:** *Facility-Wide Umbrella General Permit Templates*

*The District states that for permit applications utilizing the model general permit templates, public and agency comments on the District's proposed actions are limited to, inter alia, the applicant's eligibility for the model general permit template. In regards to the applicants' eligibility for the model general permit template, the District merely states "[b]ased on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template." See Proposed Engineering Evaluation. The District failed to include a statement of basis discussing the factual data on which the District based its decision to grant Tricor Refinery's, Kern Oil's, and Aera Energy's use of the general permit template. In addition, the District failed to include a summary of the methodology used in obtaining the data and in analyzing the data submitted to the District in the named facilities' applications. These three draft permits leave the public and regulators in the dark as to why "the applicant[s] qualify[y] for the use of th[e] [general permit] template." Id.*

**District Response:** As we noted in the application review, which acts as the statement of legal and factual basis for the proposed permit, the decision to grant Tricor Refinery's, Kern Oil's, and Aera Energy's use of the general permit template was based on the analysis provided in the template qualification form. The qualification form, which was subject to EPA and public review at the time the template was issued, defines the specific circumstances under which facilities are allowed to use the template, a step-by-step demonstration of qualification, and does not leave regulators or the public "in the dark" as you suggest.

**OCE Comment #2:** *Insufficient Monitoring/Reporting Requirements.*

*Facility-Wide Requirement 10 in Equilon Enterprise's, Tricor's, Aera Energy's, and Kern Oil's Draft Permits, states that the operator shall submit reports of any required monitoring at least every six months. The Draft Permits should be absolutely clear about what monitoring requirements must be covered in the 6 month monitoring reports. Facility-Wide Requirement 10 is not sufficiently clear.*

*We suggest the following language: "The source is required to comply with the following monitoring requirements and include such reports in the six month monitoring reports." Such language is necessary to ensure that the District, U.S. EPA, permit holder and the public are aware of the monitoring and reporting requirements in the permit. This language would then need to be followed by a precise list of the applicable monitoring and reporting requirements.*

*Finally, in Tricor's and Aera Energy's draft Title V permits, the District incorrectly cites District Rule 2520, 9.6.1 as the applicable rule requiring 6 month monitoring reports. Instead, District Rule 2520, 9.5.1 is the proper rule.*

**District Response:** All applicable monitoring requirements are already included in the proposed permit and can be readily identified by reviewing the conditions for each permit unit, so monitoring and reporting requirements are not insufficient. The "precise list" of monitoring requirements that you recommend we add to condition 10 would be redundant.

The section numbers in the draft permit were based on a previous version of District Rule 2520. The numbers will be updated to reflect the current version at the time of final action.

**OCE Comment #3:** *Lack of “Practically Enforceable” Conditions in Equilon Enterprise’s, Tricor’s, Aera Energy’s, and Kern Oil’s Draft Permits.*

*According to the CAA, conditions in a Title V permit must be “practically enforceable.” Therefore a permit requirement must make it possible to determine whether the facility is complying with the condition. Specifically, all Title V permits are legally required to incorporate all applicable record keeping requirements, and, where applicable, records of required monitoring must include the following:*

- 1) The date, time, and place of sampling or measurements;*
- 2) The dates analyses were performed;*
- 3) The company or entity that performed the analyses;*
- 4) The analytical techniques or methods used;*
- 5) The results of such analyses; and*
- 6) The operating conditions existing at the time of sampling or measurement.*

*40 CFR 70.6(a)(3)(ii)(A); District Rule 2520, 9.4.1. Reports of all required monitoring must be submitted at least every six months. Reports are required to identify all instances of deviations from permit requirements and must be certified by a responsible official. See 40 CFR 70.6(a)(3)(iii)(A); District Rule 9.13.1 and 10.0. Facility-Wide Requirements 23-25, 27-34, and 29-34 under Equilon Enterprise’s, Tricor’s, Kern Oil’s, and Aera’s Draft Permit[s] do not include any monitoring and reporting requirements to determine whether the facility is in compliance with Facility-Wide Requirements 23-25, 27-34, and 44-45. Thus, Facility-Wide Requirements 23-25, 27-34, and 44-45 are not “practically enforceable” because there is no way to determine whether the facility is in compliance with those conditions.*

**District Response:** Facility-wide conditions 23-27 and 29-34 include general requirements (e.g., labeling requirements for any containers used for architectural coatings) that may apply to certain insignificant activities that could occur at the facility (e.g., a temporary architectural coating operation exempt from permitting requirements under Section 6.8.1 of District Rule 2020). These types of operations that are exempt from permitting were designated in the District’s approved Title V program as insignificant. These requirements are practically enforceable in the permit as written. The source is still required to report deviations from these requirements under Facility wide condition 11, and to certify compliance with each of these requirements annually under condition 35. The annual certification must include the identification of the permit term, the compliance status, the method the source operator used to determine the compliance status, and any other facts required by the district to determine the compliance status. Also, if a violation were observed during an EPA or District inspection (e.g., an uncovered can of house paint was found at the facility), enforcement action could still be taken. However, permit modifications/additions will be required if the facility were to begin conducting these activities in a manner or at a level that required a permit (a level not exempt under Rule 2020). Specific monitoring requirements would be added at the time the operation was permitted.

**OCE Comment #4:** *Legal Insufficiency of the Schedule of Compliance Section.*

*A Title V permit must “assure compliance” with all applicable requirements. See 40 CFR § 70.1(b). Specifically, 40 CFR § 70.7(a)(1)(iv) provides that a permit may only be issued if “the conditions of the permit provide for compliance with all applicable requirements.” The proposed refinery permits*

*subject to these comments do not assure compliance. In particular, the status of the proposed Title V facilities' current compliance and future ability to comply with all applicable requirements is unclear.*

*All Title V permits are legally required to contain a compliance schedule as follows: 1) for applicable requirements with which the source is in compliance, a statement that the source will continue to comply with such requirements; 2) for applicable future requirements that will become effective during the permit term, a statement that the source will comply with such requirements on a timely basis; 3) a schedule of compliance for sources that are not in compliance with all applicable requirements at the time of permit issuance, including a schedule of remedial measures with an enforcement sequence of actions leading to compliance. 40 CFR 70.6(c)(3); and 70.5(c)(8)(iii)(A), (B), and (C); District Rule 2520, 9.8.1<sup>11</sup>, 9.13.1, and 9.14. In addition to the schedule of compliance, all Title V permits are required to contain a statement of compliance. District Rule 2520, 10.0.*

*The schedule of compliance section, in the relevant part, reads as follows:*

*The permittee must comply with all conditions of the permit including permit revisions originated by the District.....*

*This statement is legally insufficient. The specific contents of a compliance schedule are determined by the status of a source's compliance at the time the permit is issued. For example, if a source is currently in compliance, the compliance schedule must state that the source will "continue to comply." If there are future requirements, the schedule must state that the source must comply with them on a timely basis. If the source is not in compliance, the schedule should include a plan for the source to come into compliance.*

*The schedule of compliance section presented in the proposed permits, identified above, does not indicate the sources' current status of compliance, nor is a statement of compliance presented elsewhere in the facilities' permits. The schedule also lacks the following components: 1) a statement that the sources will "continue to comply," 2) whether there are future requirements that will become effective during a specific permit's term, 3) language that the source must comply with future requirements "on a timely basis," should the source be out of compliance, 4) a schedule of remedial measures and actions the source must take to come into compliance. These above omissions are inconsistent with federal law and District regulations.*

*One of the purposes of the Title V permitting program was to enable the public, sources, the state, and EPA to better understand a source's requirements under its permit and whether the source is meeting those requirements. Operating Permit Program, 57 Fed.Reg. 32,295 (1992). The District's failure to include the legally required information in the schedules of compliance defeats this purpose, and strips the schedules of their practical use.*

*In fact, the above language used in each of the proposed permits is a blanket statement that the District used for all of its Title V permits. As stated, such a blanket statement is legally insufficient and of no practical use.*

*The reader should not be required to infer that a source is in compliance simply by the District's omission of contrary language. In fact, in some instances such an inference may be incorrect.*

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<sup>11</sup>Note: The District has again incorrectly cited District Rule 2520, 9.9.1 under condition 5 in Tricor's and Aera Energy's draft Title V permits. The correct District Rule is Rule 2520, 9.8.1.

**District Response:** In accordance with section 9.14 of District Rule 2520, a compliance schedule is required “for sources in violation of any applicable requirement”. This source certified compliance with the applicable requirements in their initial application, and compliance with each applicable requirement was demonstrated in the Compliance section of the application review. Therefore, a compliance schedule was not required for this permit.

In addition to a compliance schedule “for sources in violation of any applicable requirement”, section 9.14 of Rule 2520 also requires a statement that the sources will continue to comply. This is addressed in condition 5, which requires that the permittee comply with all conditions of the permit including any revisions originated by the District. Because applicable requirements with future effectiveness dates are included as permit terms, the permit also assures that the permittee will comply with requirements with future effectiveness dates, as required by Section 9.14.3 of Rule 2520. Therefore, the condition is legally sufficient to satisfy the requirements of Section 9.14 of Rule 2520.

**OCE Comment #III.:** *Failure to Include a sufficient Statement of Basis with the Draft Permit. The limited information provided in the Permit Application Review is inadequate—Equilon Enterprise’s, Kern Oil’s, Tricor’s, and Aera Energy’s Draft Title V Permits*

*According to 40 CFR § 70.7(a)(5), the District must provide a statement that sets forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory and regulatory provisions. While this regulation is ambiguous as to whether the Statement of Basis must be included as part of the Draft Permit, we believe that it should be.*

*As you know, the purpose of the Statement of Basis is to provide an explanation of why the permit contains the provisions it does and why it does not contain other provisions that might otherwise be applicable. In other words, the Statement should set out the factual context for the Permit requirements. Along with the Permit Application, it provides a “background” for both decisions made by the District as well as efforts at meaningful public review. Without the Statement of Basis, effective public review is hindered. It makes sense that the District would incorporate the full Statement of Basis into Draft Permit so as to facilitate public review. Maintaining the Statement of Basis as a separate document, kept at the District Office makes one more document for interested parties to request. The practice of not incorporating the District’s analysis of the legal and factual basis for Permit actions into the Draft Permit itself implies to interested parties that all the information needed to effectively review or consult a Permit is contained within the Permit itself. This is simply not so.*

*As written, the Draft Permits contain little in the way of factual information about any of the facilities’ operations. The Permit Application Review references Attachments (the Detailed Facility Printouts) for a list of permitted equipment. The lists are of limited usefulness as tools for the public to comprehend the facilities’ operations. The Detailed Facility Printout simply gives a very brief description of particular pieces of equipment. They do not list the emissions that come from that particular piece of equipment and leaves the non-expert public in the position of guessing as to even the most general functional aspects of a facility’s operation. With the information as offered in the Detailed Facility Printouts, the interested public cannot be expected to adequately understand what type of facility is being permitted, what type of equipment is being used and for what processes, and what emissions are resulting. We believe the District should incorporate into its Statement of Basis, a much more lucid explanation of the facility, its emissions sources and abatement equipment, and its overall operational/manufacturing processes.*

*While descriptions of the facility and its process are contained in the permit application, they should be incorporated into the Draft Permit, as part of the Statement of Basis, not a mere list, included as an attachment. By including the legal and factual basis along the District's Draft Permits (including a detailed description of the facility, its emissions sources and abatement equipment, and its operational process), the Draft Permits move closer to becoming clear, comprehensive and informative documents. Such comprehensive Draft Permits will allow interested parties to effectively review what type of facility is being permitted, the applicable requirements and the reasons for those requirements upon which comments can be based.*

**District Response:** Each draft permit condition also includes a rule reference that identifies the underlying rule or regulation for each condition and a comprehensive equipment description is included in the permit for each permit unit. (e.g., EMERGENCY FIRE WATER PUMP POWERED BY 244 HP CUMMINS DIESEL-FIRED INTERNAL COMBUSTION ENGINE EQUIPPED WITH TURBOCHARGER, INTERCOOLER AND POSITIVE CRANKCASE VENTILATION). The application review further describes what type of facility is being permitted, the applicable requirements including a specific description of how compliance with each applicable requirement is assured in the permit, and the reasons for those requirements upon which comments can be based.

The federal Title V regulations in 40 CFR part 70.6, which are very prescriptive with regards to permit content, do not include provisions for including the statement of basis in the draft permit as you recommend. Including the full statement of basis in the Title V permit would unnecessarily make the permit more complex and less understandable. The application review, which acts as a statement of basis, is provided to the public free of charge upon request along with the draft permit, so there is no reason for incorporating the application review into the draft V permit.

Other more detailed information about the facility that the applicant is required to provide as part of a Title V permit application package (emissions, certifications, etc.) is also available upon request

***OCE Comment #IV.: Draft Permits refer to incorrect Facility-Wide Requirements***

*Throughout the Facility-Wide Requirements (Requirement(s)) in the draft Title V permits that the District proposes to issue to the facilities subject to these comments, the District cites incorrect applicable rules. For example:*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirement 10 denotes the requirements regarding the frequency of monitoring reports. San Joaquin Valley APCD District Rule 2520, 9.6.1 is referenced as the corresponding District Rule. District Rule 2520, 9.6.1 explains that emissions authorized by allowances under the acid rain program are excepted from this requirement. The proper corresponding District Rule is 2520, 9.5.1.*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirement 11 provides details for the prompt reporting of deviations from the permit conditions. San Joaquin Valley APCD District Rule 2520, 9.6.2 is referenced as the corresponding District Rule. District Rule 2520, 9.6.2 addresses the proper use of allowances under the acid rain program. The proper corresponding District Rule is 2520, 9.5.2.*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirement 12 is the Permit's severability clause. San Joaquin Valley APCD District Rule 2520, 9.8 is referenced as the corresponding District Rule. District Rule 2520, 9.7 is the proper corresponding as it lists the severability clause one of the necessary Permit requirements.*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirement 16 provides requirements for the furnishing of information to the District necessary for the District's consideration of possible modification, revocation, reissuance or termination of a permit. San Joaquin Valley APCD District Rule 2520, 9.9.5 is referenced as the corresponding District Rule. District Rule 2520, 9.8.5 is the proper corresponding District Rule, as it denotes the same requirements.*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirements 18, 19, 20, and 21 set out the District's inspection authority. San Joaquin Valley APCD District Rule 2520, 9.14.2.1, 9.14.2.2, 9.14.2.3, and 9.14.2.4, respectively are cited as the District's authority. However, the proper citation to the District's inspection authority is found at District Rule 2520, 9.13.2.1, 9.13.2.2, 9.13.2.3, and 9.13.2.4, respectively.*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirement 28 sets out each facilities' responsibility to certify documents submitted to the District. The District incorrectly cites District 2520, 9.14.1. The proper District Rule is Rule 2520, 9.13.1 and 10.0.*

*In Tricor's and Aera Energy's draft permits, Facility-Wide Requirement 35 lists the requirements needed in a certification of compliance. San Joaquin Valley APCD District Rule 2520, 9.17, which mandates that general permit templates, if used, shall be used without modification, is referenced as the corresponding District Rule. District Rule 2520, 9.16 is the proper corresponding District Rule, as it denotes the requirements of certifications of compliance.*

**District Response:** The section numbers in the draft permit were based on a previous version of District Rule 2520. The numbers will be updated to reflect the current version at the time of final action.

**OCE Comment #V.:** *Permit Unit Requirements contain Insufficient Monitoring, Record Keeping, and Reporting Requirements.*

*As stated above, according to the CAA, conditions in a Title V permit must be "practically enforceable." Therefore a permit requirement must make it possible to determine whether the facility is complying with the condition. Specifically, all Title V permits are legally required to incorporate all applicable record keeping requirements, and, where applicable, records of required monitoring must include the following:*

- 1) The date, time, and place of sampling or measurements;*
- 2) The dates analyses were performed;*
- 3) The company or entity that performed the analyses;*
- 4) The analytical techniques or methods used;*
- 5) The results of such analyses; and*
- 6) The operating conditions existing at the time of sampling or measurement.*

*40 CFR 70.6(a)(3)(ii)(A); District Rule 2520, 9.4.1. Reports of all required monitoring must be submitted at least every six months. Reports are required to identify all instances of deviations from*

permit requirements and must be certified by a responsible official. See 40 CFR 70.6(a)(3)(iii)(A); District Rule 9.13.1 and 10.0. Thus, the Permit Unit are not “practically enforceable” because there is no way to determine whether the facility is in compliance with those conditions. Examples of the District’s failure to include “practically enforceable” Permit Unit Requirements are provided below.

One example is found in Kern Oil’s Draft Permit. IN Kern Oil’s Draft Permit—in particular, S-37-1-3 Permit Unit Requirement 5, 6, and 7 state merely that compliance with these requirements are demonstrated by firing the unit only on PUC or FERC regulated natural gas. The District offers no explanation of why there are no included monitoring requirements. The District Rules cited (District Rules 2520, subpart 9.3.2 and 4310, subparts 5.1 and 5.23) do not mention that monitoring requirements are met merely by firing the unit on PUC or FERC regulated natural gas.

As stated above, permits must contain “conditions as are necessary to assure compliance.” This core requirement is augmented by 40 CFR § 70.6(a)(3), requiring “monitoring sufficient to yield reliable data from the relevant time period that are representative of the source’s compliance”, and 40 CFR § 70.6(c)(1) requiring Title V permits to contain “testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit.” If utilizing only PUC or FERC regulated natural gas will inherently yield emissions that meet applicable requirements, the Draft Permit should explicitly explain why this is so. As written, it is not obvious that using only PUC or FERC regulated natural gas will assure compliance with the terms and conditions of the permit and District Rules. Indeed, the basis behind the permit condition should be written so that the public can understand it.

This comment is applicable to any other Permit Unit Requirement for any other equipment unit that specifies the use of “only PUC or FERC regulated natural gas” as adequate to demonstrate compliance.

Other examples of the District’s failure to include “practically enforceable” regulations are also found throughout all of the District’s proposed permits. For example, in Kern Oil’s Draft permit, specifically, S-37-1-3 Permit Unit Requirement 2 lists a variety of documentation that must be maintained by the operator. Requirement 3 mandates that operator maintain “all records of required monitoring data and support information” for five years. Requirement 3 does not explain if the listed documents included in Requirement 2 fall under the description of “required monitoring data and support information”. If the “copies of fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance” referred to in Requirement 2 are indeed in the category of “all records of required monitoring data and support information”, then for clarity’s sake, the two Requirements should be combined. As they are written, the Requirements are ambiguous as to what exact records must be kept for a period of 5 years.

Furthermore, Permit Unit Requirement 2 requires the operator to record daily the amount and type(s) of fuels(s) combusted and all dates on which a unit is fired on any non-certified fuel. Going back to Permit Unit Requirement 5, 6, and 7, which state that compliance is determined by firing the units on PUC or FERC regulated natural gas, the permit reader is left wondering if firing a unit on “non-certified fuel” is the same thing as firing a unit on non-PUC or non-FERC regulated natural gas. If firing a unit on “non-certified fuel” is contrary to the necessity to fire the unit on PUC or FERC regulated natural gas in order to prove compliance with the sulfur compound emissions limitations, then Permit Unit Requirement 2 is essentially asking the operator to record the dates operator was out of compliance with sulfur compound emissions limitations. This demonstrates the problem with having compliance with sulfur compound emissions limitations turning on the type of fuel burned rather than requiring operator to perform straight forward monitoring and testing. If OCE’s



*interpretation of these requirements is correct, does the District monitor the Requirement 2 records which requires the operator to record daily the amount and type(s) of fuels(s) combusted and all dates on which a unit is fired on any non-certified fuel to discover incidents of noncompliance with sulfur compound emissions limitations?*

*To remediate to problems addressed above, we suggest the following language: “The source is required to comply with the following monitoring requirements and include such reports in the six month monitoring reports.” Such language is necessary to ensure that the District, U.S. EPA, permit holder and the public are aware of the monitoring and reporting requirements in the permit. This language would then need to be followed by a precise list of the applicable monitoring and reporting requirements.*

**District Response:** The basis for using PUC and FERC regulated gas to assure compliance with sulfur limits in applicable requirements is given on pages 75 and 76 of the application review (not in the permit as you suggest). The analysis shows that natural gas with a sulfur content of 3.3% or less will meet the limits in District Rule 4801 and Kern County rule 407. The application review then goes on to say that “The use of PUC or FERC regulated gas with a maximum sulfur content of .017% will assure compliance with this requirement”, which it clearly does since the use PUC gas will keep emissions below the rule limits by a factor of 194. Attachment E to the evaluation includes PUC and FERC gas specifications. The application review then goes on to specify additional periodic monitoring requirements pursuant to Rule 2520, for non-certified (not PUC or FERC regulated) gas.

In your comments, you note that Condition 2 of S-37-1 includes specific recordkeeping requirements, while condition 3 requires “all records of required monitoring data and support information.” These conditions are consistent with District rule 2520 Section 9.4, which requires that the permit include requirements to maintain records as required by any applicable requirement (40 CFR 60.48c(g) in this case), and all records of required monitoring data and support information. Although there is some overlap between these two conditions, including both these conditions assures that all recordkeeping requirements are addressed in the permit.

We disagree with your assertion that including periodic testing is superior to specifying a fuel that will assure compliance. We believe that allowing the source to show compliance with sulfur limitations by using PUC regulated gas (a certified fuel), which results in emissions lower than the District Rule 4801 limit by a factor of at least 194, is an excellent way to assure compliance with the Rule 4801 limit, and in conjunction with recordkeeping requirements included in the permit, it is not only practically enforceable but it is readily enforceable at all times during the permit term.

In answer to your question, “does the District monitor the Requirement 2 records which requires the operator to record daily the amount and type(s) of fuels(s) combusted and all dates on which a unit is fired on any non-certified fuel to discover incidents of noncompliance with sulfur compound emissions limitations?”—the answer is yes. Facility records are routinely reviewed to evaluate compliance during District compliance inspections.

All applicable monitoring requirements are already included in the proposed permit and can be readily identified by reviewing the conditions for each permit unit, so the “precise list” of monitoring requirements that you recommend we include in the reporting condition would be redundant.

Engineer Name	Douglas Shaffer
Engineer Initials	<Engineer's Initials>
Review Manager	Richard McVaigh
Facility's Regional Manager	Thomas Goff
Facility Name	AERA Energy LLC
Facility #	S-1547
Project #	S-961001
Operation Description	heavy oil production facility
Location	in western Kern County
	The following should make sense:  This is for its heavy oil production facility in western Kern County, California.
Contact Receiving Final	Ms. Peggy Shue
Mailing Address	PO Box 11164 Bakersfield, CA 93389-1164
Newspaper	Bakersfield Californian
Did EPA have objections?	No
Were there any comments?	Yes
Preliminary Notice Date	September 9, 2002

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit  
District Facility # S-1547  
Project # S-961001**

Dear Mr. Rios:

The District has issued the Final Title V Permit for AERA Energy LLC. The preliminary decision for this project was made on September 9, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin  
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit  
District Facility # S-1547  
Project # S-961001**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for AERA Energy LLC. The preliminary decision for this project was made on September 9, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin  
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Peggy Shue  
AERA Energy LLC  
PO Box 11164  
Bakersfield, CA 93389-1164

**Re: Notice of Final Action - Title V Permit  
District Facility # S-1547  
Project # S-961001**

Dear Ms. Shue:

The District has issued the Final Title V Permit for AERA Energy LLC. The preliminary decision for this project was made on September 9, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Sayed Sadredin  
Director of Permit Services

Attachments  
C: Douglas Shaffer, Permit Services Engineer

Mike Costa  
Our Children's Earth  
915 Cole St, Suite #248  
San Francisco, CA 94117

**Re: Notice of Final Action - Title V Permit  
District Facility # S-1547  
Project S-961001**

Dear Ms. Costa:

The District has issued the Final Title V Permit for AERA Energy LLC. The preliminary decision for this project was made on September 9, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Sayed Sadredin  
Director of Permit Services

Attachments  
C: Douglas Shaffer, Permit Services Engineer

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to AERA Energy LLC for its heavy oil production facility in western Kern County, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-961001, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900, or contact Seyed Sadredin, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

# TITLE V PUBLIC NOTICE CHECKLIST

FACILITY ID: S-1547 PROJECT #: S-961001

√    √  
REQST.   COMPL.

- ☐ ☐ Title V PRELIMINARY PUBLIC NOTICE
- ☐ ☐ Title V REVISED PROPOSED PUBLIC NOTICE
- ☒ ☐ Title V FINAL PUBLIC NOTICE
- ☐ ☐ Title V MODIFICATION PUBLIC NOTICE

## ENCLOSED DOCUMENTS REQUIRE:

- ☒ ☐ Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
- ☒ ☐ Stamp current date on all letters and signature page of the evaluation.
- ☒ ☐ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:
  - ☒ Engineering evaluation with attachments.
  - ☒ Public notice
- ☒ ☐ Send **FINAL** public notice for publication to: Bakersfield Californian.
- ☒ ☐ Send signed copies of all **FINAL** notice letters, engineering evaluation with attachments, and public notice to the following:
  - ☒ Douglas Shaffer, Permit Services Engineer
  - ☒ Thomas Goff, Permit Services Manager
- ☒ ☐ Enter "Mail Date" onto project record.
- ☒ ☐ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.
- ☒ ☐ Email Chay Thao Engineering Evaluation.
- ☒ ☐ Engineer to Email regional PS manager; subject: "Initial Title V permits issued, please post all prorates for S-1547."
- ☒ ☐ Other special instructions: \_\_\_\_\_  
Send **FINAL** notice letters to Mike Costa, including the Engineering Evaluation with attachments and including Public notice  
\_\_\_\_\_  
\_\_\_\_\_

Date completed: January 13, 2003 By: Douglas Shaffer



San Joaquin Valley Air Pollution Control District

Final Engineering Evaluation

Facility # S-1547  
AERA Energy LLC

PREPARED BY:

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Kamaljit Sran  
Air Quality Engineer

REVIEWED BY:

---

Richard McVaigh  
Permit Services Manager

APPROVED BY:

---

Seyed Sadredin  
Director of Permit Services

FINAL DECISION DATE:

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